

ASCENT ENVIRONMENTAL

October 2019

FINAL ENVIRONMENTAL IMPACT REPORT

Sunset Area Plan / Placer Ranch Specific Plan



COUNTY OF Placer

Final Environmental Impact Report
for the
Sunset Area Plan/Placer Ranch Specific Plan

State Clearinghouse #2016112012

PREPARED FOR:

Placer County

Community Development Resource Agency
Planning Services Division
3091 County Center Drive, Suite 140
Auburn, CA 95603
Contact:
Crystal Jacobsen, Principal Planner, Advanced Planning
Telephone: (530) 745-3000

PREPARED BY:

Ascent Environmental, Inc.

455 Capitol Mall, Suite 300
Sacramento, CA 95814
Contact:
Mike Parker, AICP
Telephone: (916) 444-7301

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LIST OF ABBREVIATIONS

ADC	alternative daily cover
ADWF	average dry-weather flow
ADT	average daily traffic
AEL	Alliance for Environmental Leadership
ASP	aerated static pile
BMP	best management practice
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CASP	covered aerated static pile
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFD	Placer County Community Facilities District
CISGP	Citizen-Initiated Smart Growth Plan
CHP	California Highway Patrol
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CSA	County Service Area
CSU	California State University
dB	decibels
dBA	A-weighted decibels
Draft EIR	draft environmental impact report
DT	dilutions to threshold
du	dwelling unit
EMU	Entertainment Mixed-Use
ESA	federal Endangered Species Act
Final EIR	final environmental impact report
GHG	greenhouse gas
HCP	habitat conservation plan
HOV	high occupancy vehicle
IS/MND	Initial Study/Mitigated Negative Declaration
lb/day	pounds per day
L_{dn}	day-night average noise level
L_{eq}	energy-equivalent noise level
LID	low impact development
LOS	level of service
L_{max}	maximum noise level (the maximum instantaneous noise level during a specific period)

mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
MRF	materials recovery facility
MSW	municipal solid waste
MT	metric ton(s)
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
NAAQS	national ambient air quality standards
NCCP	natural community conservation plan
NEPA	National Environmental Policy Act
NOP	notice of preparation
NO_X	oxides of nitrogen
PCAPCD	Placer County Air Pollution Control District
PCCP	Placer County Conservation Plan
PCTPA	Placer County Transportation Planning Agency
PCWA	Placer County Water Agency
PGWWTP	Pleasant Grove Wastewater Treatment Plant
$PM_{2.5}$	fine particulate matter with aerodynamic diameter of 2.5 micrometers or less
PM_{10}	respirable particulate matter with aerodynamic diameter of 10 micrometers or less
PRSP	Placer Ranch Specific Plan
PWWF	peak wet weather flows
RAC	rubberized asphalt concrete
ROG	reactive organic gases
SACOG	Sacramento Area Council of Governments
SAP	Sunset Area Plan
SCAQMD	South Coast Air Quality Management District
SIA	Sunset Industrial Area
SJVAPCD	San Joaquin Valley Air Pollution Control District
SPRTA	South Placer Regional Transportation Authority
sq.ft.	square feet
TDM	traffic demand management
TPR	Western Placer Waste Management Authority 2016 Transfer Processing Report
ULOP	Urban Level of Flood Protection
USACE	U.S. Army Corps of Engineers
VMT	vehicle miles traveled
WPWMA	Western Placer Waste Management Authority
WRSL	Western Regional Sanitary Landfill
WTP	water treatment plant
WWTP	Wastewater Treatment Plant

1 INTRODUCTION

This final environmental impact report (Final EIR) has been prepared by Placer County, as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). This Final EIR contains responses to comments received on the draft environmental impact report (Draft EIR) on the Sunset Area Plan/Placer Ranch Specific Plan Project. The Final EIR consists of the Draft EIR and this document, which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 BACKGROUND

The Draft EIR contains the following environmental analysis sections:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Archaeological, Historical, and Tribal Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Population, Employment, and Housing
- Public Services
- Transportation and Circulation
- Utilities
- Energy

The County used several methods to solicit input on the Draft EIR, including distribution of a notice of preparation on November 3, 2016, to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document. Two public scoping meetings for the EIR were held on November 29, 2016 (first meeting from 3:00 to 5:00 p.m. and second meeting from 6:00 to 8:00 p.m.) at the Western Placer Waste Management Authority Materials Recovery Facility in Roseville, California.

On December 18, 2018, the Draft EIR was released for a 67-day public review and comment period that ended on February 19, 2019. The Draft EIR was submitted to the State Clearinghouse; posted on the County's website (http://www.placer.ca.gov/sunset); and made available at Placer County Planning Services in Auburn, California. In addition, the Draft EIR was distributed directly to public agencies (including potential responsible and trustee agencies), interested parties, and organizations.

A public hearing was held on February 14, 2019, to receive input from agencies and the public on the Draft EIR. The hearing was held during the regular meeting of the Placer County Planning Commission at 10:05 a.m. The hearing was recorded, and a transcript was prepared.

1.2 ORGANIZATION OF THIS FINAL EIR

This Final EIR is organized as follows:

- **Chapter 1, "Introduction,"** provides an introduction and overview of the Final EIR, describes the background and organization of the Final EIR, and lists all parties who submitted comments on the Draft EIR during the public review period.
- **Chapter 2, "Revisions to the Draft EIR,"** presents revisions to the Draft EIR text made in response to comments or to amplify, clarify, or make minor modifications or corrections. Changes in the text are signified by ~~strikeouts~~ where text is removed and by underline where text is added.
- **Chapter 3, "Responses to Comments on the Draft EIR,"** contains copies of the comment letters on the Draft EIR received during the public review period, a copy of the transcript from the February 14, 2019, public hearing, and responses to the comments. Comments received within 1 week of the close of the public review period are also included. The chapter begins with a set of master responses that were prepared to comprehensively respond to multiple comments that raised similar issues. A reference to the master response is provided, where relevant, in responses to individual comments.
- **Chapter 4, "Mitigation Monitoring and Reporting Program,"** includes a description of the CEQA requirements for monitoring or reporting programs for projects approved by a public agency. In addition, the Mitigation Monitoring and Reporting Program (MMRP) includes all the mitigation measures identified in the Draft EIR for the project, including revisions to mitigation measures as described in Chapter 2 of this Final EIR, along with the party responsible for monitoring implementation of the mitigation measures and the milestones for implementation and monitoring. The intent of the MMRP is to prescribe and enforce the proper and successful implementation of the mitigation measures as identified in the EIR for this project.
- **Chapter 5, "References,"** identifies the organizations and persons consulted during preparation of this Final EIR and the documents used as sources for the analysis.
- **Chapter 6, "List of Preparers,"** identifies the lead agency contacts and the preparers of this Final EIR.

1.3 LIST OF COMMENTERS

Table 1-1 indicates the numerical designation for each comment letter received on the Draft EIR, the author of the comment letter, and the date of the comment letter.

Table 1-1 List of Commenters

Letter #	Commenter	Date of Comment
	Agencies	
1	California Department of Transportation Kevin Yount, Branch Chief, Office of Transportation Planning Regional Planning Branch—East	February 22, 2019
2	City of Lincoln Matthew J. Wheeler, P.E., Community Development Director	February 20, 2019
3	City of Rocklin David Mohlenbrok, Community Development Director	February 22, 2019
4	City of Roseville Kevin Payne, Assistant City Manager	February 22, 2019

Table 1-1 List of Commenters

Letter #	Commenter	Date of Comment
5	Placer County Air Pollution Control District Yushuo Chang, Planning and Monitoring Section Manager	February 22, 2019
6	Placer County Fish and Game Commission Mickey Daniels, Vice Chair	No date
7	Placer County Water Agency Anthony L. Firenzi, P.E., Deputy Director of Technical Services	January 31, 2019
8	Placer County Water Agency Brian Rickards, P.E., Associate Engineer	September 10, 2018; January 30, 2019; February 1, 2019; February 13, 2019; and February 15, 2019
9	Placer County Water Agency Brian Rickards, P.E., Associate Engineer	February 22, 2019
10	Western Placer Waste Management Authority Robin R. Baral, Churchwell White LLP	February 22, 2019
	Organizations	
11	Alliance for Environmental Leadership Leslie Warren, Chair	January 24, 2019; February 9, 2019
12	Alliance for Environmental Leadership Sara A. Clark, Esq., and Laurel L. Impett, AICP, Urban Planner, Shute Mihaly & Weinberger LLP	February 22, 2019
13	Brookfield Sunset, LLC Marcus J. Lo Duca, Law Office of Marcus J. Lo Duca	February 22, 2019
14	California Native Plant Society Jeanne M. Wilson, President, Redbud Chapter	February 22, 2019
15	The California State University, Office of the Chancellor Elvyra F. San Juan, Assistant Vice Chancellor	February 21, 2019
16	Center for Biological Diversity Ross Middlemiss, Legal Fellow	February 22, 2019
17	CP 3500 Cincinnati, LLC, and CP 3500 BLDG I, LLC Marcus J. Lo Duca, Law Office of Marcus J. Lo Duca	February 22, 2019
18	W.H. Whitaker, Managing Attorney, Legal Services of Northern California (representing unidentified clients)	February 22, 2019
19	Placer Athens LP/Placer Athens II LP Tim Kwan and Daniel Lee	February 12, 2019
20	Placer Community Foundation Veronica Blake, CEO	February 20, 2019
21	Placer County Solid Waste Local Task Force Devin Whittington, Chair	February 13, 2019
22	Placer Group Sierra Club Mike Garabedian	February 22, 2019
23	Placer Women Democrats Melissa Harty-Swaleh	February 20, 2019
24	Reclamation District 1000 Kevin L. King, General Manager	February 19, 2019
25	Roseville City School District Susan Calhoun, Maintenance and Facilities	January 23, 2019

Table 1-1 List of Commenters

Letter #	Commenter	Date of Comment
26	Roseville Joint Union High School District Joe Landon, CPA, Assistant Superintendent	February 22, 2019
27	SARSAS [Save Auburn Ravine Salmon and Steelhead] Jack L. Sanchez, President and Founder	No date
28	Sierra Club, Sierra Nevada Group Barbara Rivenes, Chair	February 20, 2019
29	Sierra Foothills Audubon Society Don Rivenes, Conservation Chair	February 10, 2019
30	Stanford Ranch I, LLC Larry D. Kelley, Sr., Manager	February 19, 2019
31	United Auburn Indian Community Trainor Fairbrook	February 14, 2019
32	Waterford II Homeowners Association B.J. Baker, Assistant Secretary	January 13, 2019
	Individuals	
33	Amber Beckler	January 13, 2019
34	Jan Bell	February 22, 2019
35	Cheryl Berkema	January 14, 2019
36	Cheryl Berkema	February 18, 2019
37	Cheryl Berkema	February 22, 2019
38	Larissa Berry	January 13, 2019
39	Larissa Berry	January 31, 2019
40	Larissa Berry	February 13, 2019
41	Larissa Berry	February 21, 2019
42	Kathleen Crawford	February 21, 2019
43	Charlene Daniels	February 22, 2019
44	Kristen Farquhar	February 21, 2019
45	Brett Hoffman	February 20, 2019
46	Carol Holliman	February 22, 2019
47	Terence Holliman	February 20, 2019
48	Dr. Glen Holstein, Consulting Environmental Scientist	February 12, 2019
49	Arlene Jamar	February 21, 2019
50	Holly Johnson	January 12 and 14, 2019
51	Scott Johnson	February 14, 2019
52	Scott Johnson	February 19, 2019
53	Daniel Ketchum	February 21, 2019
54	Lisa Larkin	February 21, 2019
55	Deanna Marsh	February 21, 2019
56	Genevieve Marsh	February 12, 2019
57	Lorraine Marsh	February 18, 2019

Table 1-1 List of Commenters

Letter #	Commenter	Date of Comment
58	Pam and Tom Menconi	February 19, 2019
59	Loretta Moreno	January 29, 2019
60	Lorie Moreno	February 21, 2019
61	Wayne Nader	February 14, 2019
62	Peggy Just Peterson	January 13, 2019
63	Gayle Russell	February 16, 2019
64	Delana Ruud	February 22, 2019
65	Albert Scheiber	No date
66	Barbara V. Smith	February 22, 2019
67	Roger Smith	February 21, 2019
68	Lynne and Mark Snyder	February 22, 2019
69	Angela Torrens	February 22, 2019
70	Emily Anne Ward	February 20, 2019
71	Leslie Warren	February 22, 2019
72	William Michael Wauters	February 20, 2019
	Late Comments	
73	Unknown	February 25, 2019
74	Leslie Warren	June 27, 2019
	Public Hearing on the Draft EIR	
PH	Various commenters at the Placer County Planning Commission Hearing	February 14, 2019

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2 REVISIONS TO THE DRAFT EIR

This chapter presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Master Response 8: Recirculation; see also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

2.1 REVISIONS TO THE DRAFT EIR

This section presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in strikethrough (~~strikethrough~~), and text additions are shown in underline (<u>underline</u>).

It should be noted that the following revisions do not change the intent or content of the analysis or effectiveness of mitigation measures presented in the Draft EIR.

2.1.1 Revisions to Chapter 1, "Introduction"

In response to comment 15-1, the second paragraph on page 1-2 of the Draft EIR is revised as follows:

> This EIR evaluates the potential environmental impacts associated with implementing the SAP and PRSP. The SAP is a policy document intended to guide growth in the SAP area over a 20-year planning horizon; buildout of the SAP area is expected to occur over 80 years or more. In accordance with Section 15168 of the State CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project and, among other things, are related geographically or in connection with issuance of rules, regulations, or plans to govern the conduct of a continuing program. In accordance with Section 15161 of the State CEQA Guidelines, a project EIR focuses on the changes in the environment that would result from a development project. Because of the broad geography, long timeframe anticipated for buildout, and policy-oriented nature of the SAP, the impact analysis of the SAP is prepared at a programmatic level—that is, a more general analysis with a level of detail and degree of specificity commensurate with that of the plan itself, focusing on the effects that can be expected to follow from adoption of the plan. The PRSP, however, is assessed at a project level in this EIR, because project details are developed to a sufficient degree that environmental effects that would result from development of the PRSP can be identified and assessed with greater certainty, and specific mitigation measures developed to address potentially significant impacts. The Sac State–Placer Center portion of the PRSP, however, remains conceptual; the university has yet to develop project-specific detail in the form of a master plan for the campus. ~~This EIR provides substantial analysis of the university campus based on the information available and will provide valuable streamlining for future decisions by the California State University (CSU), but additional environmental review may be required by the CSU, which would serve as lead agency for the subsequent project.~~ <u>Therefore, this EIR evaluates the Sac State–Placer Center at a programmatic level of detail for educational use. In the event the Board of Trustees of the California State University (CSU) accepts the property on behalf of the State of California, the site would be under the land use and permitting jurisdiction of the CSU, which would relieve Placer County of jurisdictional authority over the site. Specifically, when the transfer is complete, the governing policies of the Placer County General Plan and the PRSP as then adopted will no longer be applicable to the site. Prior to a discretionary action by the CSU requiring consideration under CEQA, the CSU would conduct its own project-specific environmental review. At that time, the university would</u>

ensure compliance with the procedural and substantive requirements of CEQA and in fully addressing potential environmental impacts as required by law. Additional discussion regarding the level of detail of the analysis is provided under the heading "Approach to the Environmental Analysis" in Chapter 4.0, "Affected Environment, Environmental Consequences, and Mitigation Measures."

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first paragraph under Section 1.3.2, "Revisions to the Placer Ranch Specific Plan," on page 1-3 of the Draft EIR is revised as follows:

Since the close of the 30-day period to provide a response to the NOP, County staff have engaged in environmental analysis of the project and continued to coordinate with local agencies with regard to its environmental effects. The County has sought input from several local agencies and entities, including the Cities of Roseville, Rocklin, and Lincoln; Western Placer Waste Management Authority; Placer County Air Pollution Control District; the CSU; and United Auburn Indian Community. Based on input from these agencies and entities, comments received in response to the NOP, early environmental analysis, changing market conditions, and continued, regular coordination with affected agencies and stakeholders, changes to the PRSP land use plan were deemed warranted. The primary changes include increasing the distance between land designated for residential uses and the Western Regional Sanitary Landfill property, increasing the number of low-density residential units, decreasing the number of medium- and high-density residential units, decreasing the General Commercial and Campus Park floor area, decreasing the acreage of open space by 8 acres, and increasing the acreage of parks by 19 acres, such that County General Plan policies for parkland acreage would be met on-site. The net change by land use type is identified in the list below and shown in Table 1-1:

2.1.2 Revisions to Chapter 2, "Executive Summary"

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. To clarify the scope of the NEPA document requirement, the bulleted list of required permits and approvals on page 2-3 of the Draft EIR is revised as follows:

The following approvals and permits are required from other agencies to implement the proposed PRSP:

- approval of a NEPA document for the PRSP (USACE),
- Section 404 Individual Permit (USACE),
- Section 7 Consultation (USFWS and National Marine Fisheries Service),
- …

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The bulleted list of required permits and approvals on pages 2-3 and 2-4 of the Draft EIR is revised as follows:

- Section 1602 Streambed Alteration Agreement (CDFW),
- amendment of the Wastewater Service Area boundaries (South Placer Wastewater Authority and local agency formation commission), ~~and~~
- agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility~~.~~, and

- approvals and permits through CSU for development of the Sac State–Placer Center.

To provide a minor correction to the Executive Summary table to reflect the correct impact conclusion for Impact 4.1-2 before and after mitigation (which is correctly identified in Section 4.1, "Aesthetics," of the Draft EIR), Table 2-1 on page 2-7 of the Draft EIR is revised as follows:

Table 2-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
NI = No impact LTS = Less than significant	PS = Potentially significant unavoidable	S = Significant	SU = Significant and
4.1 Aesthetics			
Impact 4.1-2: Substantial degradation of the existing visual character or quality of the site and its surroundings after buildout Implementing the project would maintain or improve visual quality in several parts of the project area. However, in areas where there would be a contrast between rural areas and new development, implementing the project would substantially degrade visual quality. In locations where the visual character is rural or agricultural and the project calls for development rather than preservation of existing conditions, development of the project area would substantially change the visual character of portions of the sites. This impact would be potentially significant.	~~LTS~~ PS	No mitigation is ~~required~~ available.	~~LTS~~ SU

To correct a typographical error, the second bullet of Mitigation Measure 4.3-2a on page 2-10 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-2a: Implement PCAPCD's recommended construction mitigation measures (Net SAP Area and PRSP Area)

…

- The contractor shall submit to the PCAPCD a comprehensive equipment inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower ~~of~~ or greater) that will be used in aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the contractor shall contact the PCAPCD before the new equipment being utilized. At least three business days before the use of subject heavy-duty off-road equipment, the project representative shall provide the PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and on-site foreman.

To correct a typographical error, the first bullet of Mitigation Measure 4.3-3c on page 2-17 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-3c: Purchase ROG and NO_X offsets through PCAPCD's Off-Site Mitigation Fee Program (Net SAP Area and PRSP Area)

…

- Establish mitigation off-site within the west Placer County by participating in an off-site mitigation program, coordinated by PCAPCD. Examples include, but are not limited to: participation in a ~~b~~ biomass program that provides emissions benefits; retrofitting, repowering, or replacing heavy-duty engines from mobile sources (e.g., buses, construction equipment, on road haulers); or other programs to reduce emissions.

The County has revised Mitigation Measure 4.3-5a on page 2-19 of the Draft EIR, as follows, to address currently planned industrial expansions in the net SAP area and to provide specific measures for residential development that may be proposed near existing/planned industrial development:

Mitigation Measure 4.3-5a: Incorporation of design features ~~at truck loading areas~~ to reduce health-risk exposure at sensitive receptors (Net SAP Area and PRSP Area)

~~Before Design Review approval~~ Prior to Design Review approval and/or issuance of grading permit, ~~project proponents shall design developments~~ new development shall be designed so that truck loading/unloading facilities ~~and sensitive receptors~~ are not located within 1,000 feet of ~~each other~~ existing or planned sensitive receptors, if feasible considering site design parameters. Existing or previously approved industrial/commercial development, including any development within boundaries of existing industrial parks, are not subject to this mitigation measure. For the purpose of this mitigation measure, a truck loading/unloading facility is defined as any truck distribution yard, truck loading dock, or truck loading or unloading area where more than one truck with three or more axles will be present for more than 10 minutes per week, on average; and sensitive receptors include residential land uses, campus dormitories and student housing, residential care facilities, hospitals, schools, parks, playgrounds, or daycare facilities. A truck loading/unloading facility ~~and a sensitive receptor~~ can be located within 1,000 feet of ~~each other~~ a sensitive receptor only if ~~a project proponent~~ the project applicant prepares a qualified, site-specific HRA showing that the associated level of cancer risk at the sensitive receptors would not exceed 10 in 1 million. The HRA shall be conducted in accordance with guidance from PCAPCD and shall be approved by PCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. Design measures may include but are not limited to the following:

- Implement Mitigation Measure 4.3-3a, which requires all truck loading/unloading facilities to be equipped with one 110/208-volt power outlet for every two-truck loading/unloading facility. A minimum 2-foot-by-3-foot sign shall be clearly visible at each loading dock that indicates, "Diesel engine idling limited to a maximum of 5 minutes." The sign shall include instructions for diesel trucks idling for more than 5 minutes to connect to the 110/208-volt power to run any auxiliary equipment. This measure is recommended in PCAPCD's *CEQA Handbook* (PCAPCD 2017a) and is also consistent with measure VT-1 in the CAPCOA guide (CAPCOA 2010:300–303).

- The use of electric-powered "yard trucks" or fork lifts to move truck trailers around a truck yard or truck loading/unloading facility.

- The use of buildings or walls to shield commercial activity from nearby residences or other sensitive land uses.

- The use of EPA-rated Tier 4 Final engines in diesel-fueled construction equipment when construction activities are adjacent to existing sensitive receptors.

- Plant and maintain a vegetative buffer between the truck loading/unloading facility and nearby sensitive residences, schools, and daycare facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

Applicants of residential or commercial development with new sensitive receptors proposed to be located within 1,000 feet of existing and/or planned commercial/industrial facilities that include, or may include, truck loading/unloading facilities, shall prepare an HRA as described above. Design measures identified in the HRA may include but are not limited to the following:

- Redesign the project to increase the distance between sensitive receptors and potential truck loading/unloading facilities;
- Use of upgraded filtration systems in the residential HVAC systems;
- Use of intervening buildings or walls to shield the receptors from the truck loading/unloading facility;
- Plant and maintain a vegetative buffer between sensitive receptors and the truck loading/unloading facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

To clarify mitigation for Impact 4.3-6 (Create objectionable odors affecting a substantial number of people), the following two new mitigation measures are added to page 2-20 of the Draft EIR:

Mitigation Measure 4.3-6a: Implement odor-reducing measures at the Western Regional Sanitary Landfill

WPWMA developed a slate of odor reduction measures it estimates will reduce WRSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058, the projected year of landfill closure and conservative estimate of project buildout. Measures apply to composting operations, landfill operations, and site-wide technologies and operations. Capital costs and costs for ongoing operation and maintenance of the measures were also estimated. (See Technical Report #2, prepared by CE Schmidt and TR Card, dated August 2, 2019, and correspondence from Robin R. Baral, Churchwell White, LLP, on behalf of the Authority, to Clayton Cook, Placer County Counsel, dated August 22, 2019.)

These measures, while not expressly proposed by WPWMA as the basis of a regional mitigation fee program, could logically serve that function. To develop a program, the Authority can and should take the additional steps to determine the type and geographic scope of fee program participants, the pro-rata share per given unit of development, and processes and procedures to administer the program. Based on information provided by WPWMA, the specific odor-reducing measures to be implemented under the program could include:

- **Implement Aerated Static Pile (ASP) Technology and Compost Best Management Practices (Tier 1, Composting Operations).** To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology consisting of aerated static pile (ASP) technology in which air flow is induced through the material without turning or mixing. According to WPWMA, implementation of this measure is already planned for implementation. To ensure optimal odor reduction, best management practices (BMPs, e.g., anaerobic digestion of food waste) and training are also needed.
- **Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations).** To ensure maximum composting odor reduction, odor emissions testing is required on an annual basis to monitor odors and implement appropriate response is target reductions are not being achieved.

- Construct and Operate a Mixing Building with Biofilter (Tier 1, Composting Operations). To reduce odors associated with food waste composting, a mixing building fitted with a biofilter for air scrubbing should be constructed. The building would be a relatively small structure within which food waste would be received, blended with shredded green waste, then transferred to the ASP system where it would undergo controlled composting.

- Apply Odor Neutralizers to Sorted Refuse (Tier 1, Landfill Operations). To reduce landfill-related odor emissions, odor neutralizers should be applied to sorted refuse between transfer from the materials recovery facility (MRF) to the landfill site. This measure involves initial implementation of a spray system and ongoing application of neutralizer.

- Apply Odor Neutralizers to Active Landfill Face and Implement BMPs (Tier 1, Landfill Operations). To reduce landfill-related odor emissions, odor neutralizers should be applied to the active landfill face. Like that for sorted refuse, this measure involves initial implementation of a spray system and ongoing application of neutralizer. BMPs, such as limiting the size of the active landfill face, would optimize odor neutralizer operations.

- Increase Screening of Landfill Gas and Implement Response Actions (Tier 1, Landfill Operations). Quarterly screening for fugitive landfill gas should be conducted to identify "hot spots" of landfill gas emissions through interim and final landfill covers. Such screening would reduce the time between identification and repair of surface hot spot emissions, and thus odor.

- Enhance Landfill Gas Collection (Tier 1, Landfill Operations). To reduce landfill-related odor emissions, WPWMA should establish stricter protocols for landfill gas collection. Because landfill gas must be used, flared, or stored in a leak-free container, minimizing odorous emissions would involve operating the system for maximum containment of gas rather than maximum cost-effective performance of the gas-to-energy system.

- Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies and Operations). To monitor odor emissions in areas around the WRSL, odor sensors should be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the Authority's dispersion modeling capabilities should also be implemented to better predict the nature, location, and intensity of odor issues.

- Establish Odor Hotline and Implement Community Outreach (Tier 1, Site-wide Technologies and Operations). An odor hotline should be established to allow the public ready access to WPWMA staff who will receive community complaints and concerns, and to provide timely response actions.

- Establish Tree-lined Perimeter of WRSL (Tier 1, Site-wide Technologies and Operations). Trees with aromatic foliage, such as pine or eucalyptus, should be planted around WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility.

- Implement Compost Curing Controls (Tier 2, Composting Operations). To further reduce compost-related odor emissions, ASP techniques, described above for raw compost, can and should be used on cured compost.

- Improve Pond Aeration (Tier 2, Composting Operations). Leachate collected from composting activities is rich in organic compounds and therefore odorous, especially in anaerobic conditions. To further reduce odor emissions from the ponds, leachate should be aerated to increase aerobic digestion of organic compounds and reduce fugitive odors.

- Implement Monthly Odor Testing and Response Actions (Tier 2, Composting Operations). Monthly odor testing should be implemented to ensure odor reduction measures for active and cured compost are functioning as expected and to implement corrective actions as needed.

- Apply Posi-Shell Landfill Cover (Tier 2, Landfill Operations). Posi-Shell is an enhanced form of landfill cover that uses a blend of clay, fibers, and polymers to produce a spray-applied mortar that dries in the form of a thin durable stucco. Posi-Shell, or similar membrane cover, should be applied to reduce landfill-related odor emissions.

- Implement Continuous Cover on Active Landfill Face (Tier 2, Landfill Operations). Odor-neutralizing foam or similar product should be used on the active landfill face during fill operations to reduce landfill-related odor emissions.

- Conduct Additional Landfill Gas Monitoring and Implement Response Actions (Tier 2, Landfill Operations). Additional monitoring should be conducted to ensure that landfill gas leaks and emissions are not occurring in the above-ground system during gas collection and response actions implemented to correct such leaks if they are discovered.

Mitigation Measure 4.3-6b: Require fair-share contribution to WPWMA for odor mitigation

As described in the Draft EIR at pages 4.3-6 through 4.3-11, objectionable odors are currently generated at WPWMA facilities, odor complaints are regularly lodged, and odors are an existing issue. It would be neither feasible nor reasonable for all odor mitigation costs to be borne by the proposed project. Therefore, based on the Authority-proposed measures, their costs, and a reasonable methodology to determine a fair-share contribution, Placer County shall require the proponents of the Placer Ranch Specific Plan to contribute a total payment of $2,465,273 to the Western Placer Waste Management Authority for purposes of funding odor reduction measures that will reduce odor impacts resulting from development within the Placer Ranch Specific Plan area.

The payment required of Placer Ranch Specific Plan proponents is based on: (1) the cost of non-Authority-funded Tier 1 odor control measures, apportioned by the number of residential units that could be developed in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary, and (2) a fair-share proportion of annual maintenance costs converted to present value over a 30-year absorption period, also apportioned by non-university residential units. Because odors are an existing issue, and because the entire project (PRSP and net SAP) would conservatively generate approximately 16 percent of odorous emissions compared to baseline conditions and 8 percent of odorous emissions in 2058 (estimated year of landfill closure and conservative estimate of project buildout), the proposed contribution for both capital expenditures and maintenance costs is considered conservative, that is, it more than compensates for the impact of the project. Costs include $2,172,513 in capital investment, plus approximately $290,000 for a one-time, good-faith contribution to operation and maintenance costs of the measures over a 20-year period. (The details and assumptions involved in the calculation of capital funding are described in greater detail in Master Response 4: Odors of the Final EIR.)

In addition to the fair-share contribution for odor mitigation required of PRSP, Placer County will require fair-share contribution by other future residential developments proposed in the net SAP area in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. Based on the Authority's comprehensive assessment of odor control measures, their efficacy, and costs, it is expected that WPWMA can and should develop a bona fide regional fee program to which proponents of regional development projects will contribute to implement, operate, and maintain odor control measures.

In response to comment 16-5 and to clarify that the mitigation measure is intended to relocate turtles to equal- or better-quality habitat than the affected habitat and protect eggs and hatchlings as well as adult turtles, Mitigation Measure 4.4-5a on pages 2-29 and 2-30 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-5a: Minimize and avoid disturbances to western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird; compensate for loss of occupied habitats (Net SAP Area and PRSP Area)

Western Pond Turtle

Before ground disturbing activities, project proponents shall retain a qualified biologist to determine whether the potential project site contains suitable habitat for western pond turtle. For projects or ground-disturbing activities (including any required off-site improvements) with potential to disturb suitable aquatic or adjacent upland habitat for western pond turtle, the following measures shall be implemented.

- Within 24 hours before beginning construction activities within ~~200~~ 300 feet of suitable aquatic habitat for western pond turtle, a qualified biologist shall survey areas of anticipated disturbance for the presence of western pond turtle, including eggs and hatchlings. The construction area shall be re-inspected whenever a lapse in construction activity of two weeks or more has occurred. If pond turtles or their eggs are found during the survey or observed within the construction area at any other time, they shall be relocated by a qualified biologist, outside of the area of disturbance, to the nearest area ~~with~~ of suitable aquatic habitat of equal or better quality as the affected habitat. ~~and~~ CDFW will be notified of the discovery and relocation of any western pond turtles.

- If western pond turtle nests are found in the disturbance area during preconstruction surveys, a 300-foot no disturbance buffer shall be established between the nest and any areas of potential disturbance. Buffers shall be clearly marked with temporary fencing. Construction will not be allowed to commence in the exclusion area until hatchlings have emerged from the nest, or the nest is deemed inactive by a qualified biologist. When hatchlings emerge from the nest, they shall be relocated by a qualified biologist to suitable aquatic habitat outside of the area of disturbance.

To correct a typographical error, the fourth bullet of Mitigation Measure 4.4-7a on page 2-38 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees (Net SAP Area and PRSP Area)

...

- The project proponent required to replace lost trees shall provide appropriate irrigation and maintenance to replacement trees and will enter into a maintenance agreement with the County. The project proponent shall post a deposit for the replacement cost of replanted trees to the County and the deposit shall be retained until the County arborist certifies that conditions of the tree permit have been satisfied.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.4-8c on page 2-39 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-8c: Provide wildlife crossing structures (Net SAP Area and PRSP Area)

The County shall require road crossings over the stream system open space areas to be designed to provide safe wildlife movement using wildlife overpasses, underpasses, bridges, or culverts that are adequately sized to allow safe crossing even during high water. Design of crossings shall be based on

movement requirements for the range of common and sensitive native wildlife species in the region. Where feasible and appropriate, fencing may be used to direct animals toward wildlife crossing structures and away from roadways. For the Sac State–Placer Center site, safe wildlife movement facilities shall be provided as applicable to the Sac State–Placer Center site.

To allow cogeneration as an option for reducing energy use, Mitigation Measure 4.7-2a on pages 2-53 through 2-55 of the Draft EIR is revised as follows:

Mitigation Measure 4.7-2a: Implement all feasible on-site features to reduce operational GHG emissions (Net SAP Area and PRSP Area)

The County will require project proponents of development proposed under the project to incorporate the following measures to reduce operational emissions of GHGs to the extent feasible.

…

Building Energy

Reduce GHG emissions associated with building energy through the following measures:

…

- Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Reductions can also be achieved by incorporation of co-generation facilities. Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.

In response to comment 5-2, the discrepancies in the amount of mitigated greenhouse gas (GHG) emissions are addressed, and Mitigation Measure 4.7-2b on pages 2-55 through 2-57 of the Draft EIR is revised as follows:

Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area)

The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. This mitigation measure is consistent with guidance recommended by PCAPCD and CARB (PCAPCD 2017:54, CARB 2017:152). This measure is also consistent with the State CEQA Guidelines, which recommend several options for mitigating GHG emissions. State CEQA Guidelines Section 15126.4(C)(3) states that measures to mitigate the significant effects of GHG emissions may include "off-site measures, including offsets that are not otherwise required…."

Project proponents shall implement an off-site GHG emissions reduction program or to pay GHG offset fees to compensate for the project's emissions in excess of 1,100 $MTCO_2e$ for a single year, or as determined feasible by the County and project proponent. The off-site program shall comply with approved protocols from California Air Pollution Control Officers Association's (CAPCOA) GHG Rx program or CARB's Cap & Trade Offset protocols. Alternatively, the project proponent can purchase local or California-only GHG mitigation credits through the CAPCOA GHG Rx program or ARB accredited offset project registry. At the time this EIR was written, the average rate ranges from $8 to $35 per metric ton of CO_2e.

The net SAP area would generate ~~373,896~~ 367,900 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 366,800 MT CO_2e for a period of one year, or 49.13 $MTCO_2e$/year per thousand square feet of nonresidential development

and 27.27 $MTCO_2e$/year for each residential unit in the net SAP area. ~~Based on the current average rate of $12 per metric ton of CO_2e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal $5,120,190 (equivalent to $0.66 per square foot for nonresidential and $954 per residential unit).~~

PRSP would generate ~~195,014~~ 195,990 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 $MTCO_2e$, or ~~27.14~~ 27.27 $MTCO_2e$/year for each residential unit in the PRSP area. ~~The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal $1,706,730 (equivalent to $955 per residential unit).~~ Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K.

This condition shall be satisfied prior to the recordation of each Small Lot Final Map or building permit issuance when a small lot map is not required.

PCAPCD and CARB also recommend that lead agencies prioritize direct investments in GHG emission reductions near the project site to provide potential local air quality and economic co-benefits. ~~For example, mPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting."~~

~~Other e~~Examples of local direct investments include financing installation of regional electric vehicle–charging stations, paying for electrification of public school buses, and investing in local urban forests. However, it is critical that any such investments in actions to reduce GHG emissions are real and quantifiable, as determined by the County, ~~PCAPCD,~~ or a consultant selected by the County.

Where development of a local offset is not feasible, the County will allow project proponents to mitigate GHG emissions through the purchase of ~~local or California-only~~ carbon credits issued through the CAPCOA GHG Rx program or CARB-accredited offset project registry. The purchase of carbon credits shall be prioritized in the following manner: offsite within the SVAB portion of Placer County, within Placer County, or within California.

The GHG reductions achieved through an offset or through the purchase of a carbon credit must meet the following criteria:

- **Real**—They represent reductions actually achieved (not based on maximum permit levels).
- **Additional/surplus—**They are not already planned or required by regulation or policy (i.e., not double counted).
- **Quantifiable**—They are readily accounted for through process information and other reliable data.
- **Enforceable**—They are acquired through legally binding commitments/agreements.
- **Validated**—They are verified through the accurate means by a reliable third party.
- **Permanent**—They will remain as GHG reductions in perpetuity.

The project applicant can satisfy the requirements of this measure by purchasing sufficient carbon credits through the accredited carbon credit registries, investing in a local GHG reduction project/program which complies with the approved protocol from the CAPCOA GHG Rx program or CARB's Cap-and-Trade offset protocols, or paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the small lot final map or approval of the first building permit when a small lot map is not required. Demonstration of compliance shall be provided to the County and carbon offset purchases should be verified by a third party. If the mitigation fee is chosen,

the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices for GHG allowances at the time of the small lot final map recordation or building permit issuance when a small lot map is not required.

~~Establishment of offsets or purchases of carbon credits to offset operational generated GHG emissions should be made prior to recordation of each small lot final map, or approval of the first building permit when a small lot map is not required.~~

To correct a typographical error, Mitigation Measure 4.8-1a on page 2-57 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-1a: Complete a Phase I ESA (Net SAP Area)

A Phase I ESA shall be completed by project proponents of individual projects in the net SAP area. The Phase I ESA shall be performed in general conformance with the scope and limitations of ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and EPA "Standards and Practices for All Appropriate Inquires," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the project proponent shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted. These recommendations shall be implemented, and the site shall be deemed remediated by the appropriate agency (DTSC, Placer County Department of Environmental Health Services [PCDEHS]) or Placer County shall issue a No Further Action letter before earth disturbance in the vicinity of the contamination.

To provide a minor clarification, Mitigation Measure 4.8-2 on page 2-60 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-2: Implement measures specified in CCR Title 27 to minimize intrusion of landfill gas into structures (Net SAP Area and PRSP Area)

For any structure sited within 1,000 feet of the WRSL property boundary, the following measures specified in CCR Title 27 Section 21190(g) shall be included in the construction drawings ~~and/or blueprints~~ (as applicable) for review and approval by the County Health and Human Services Department:

To provide clarification, Mitigation Measure 4.9-1b on page 2-64 of the Draft EIR is revised as follows:

Mitigation Measure 4.9-1b: Design, construct, and maintain regional stormwater retention and detention facilities or pay retention mitigation fees (Net SAP Area and PRSP Areas)

The improvement plan submittal and final drainage report shall ~~provide details on how to achieve the following requirements:~~ demonstrate, through the preparation of technical engineering studies, that the increased peak flow and volume of stormwater runoff from the proposed development can be accommodated on-site or in the approved City of Roseville Regional Stormwater Retention Facility and/or other off-site facility. The study shall:

1. Be submitted to the City of Roseville Public Works Department for review and concurrence if the net SAP or PRSP is proposing to utilize the City of Roseville Regional Stormwater Retention facility for stormwater retention;

2. Demonstrate, through the preparation of technical engineering studies, that s~~S~~tormwater run-off peak flows ~~shall be reduced to~~ obtain an objective post-project mitigated peak flow that is equal to the estimated pre-project peak flow, less 10 percent of the difference, through the installation of detention facilities; and,

~~2~~.3. Demonstrate through the preparation of technical engineering studies, that s~~S~~tormwater volumetric increases ~~shall be~~ are mitigated to retain the increase for the 100-year, 8-day design storm, depth of 10.75 inches at elevation of 200- feet, unless another methodology has been agreed upon by Placer County. The project proponent shall either provide permanent on-site retention or participate in a regional stormwater retention program, if established by the County, by paying retention mitigation fees including maintenance and operation costs, as deemed appropriate, to mitigate the project's increases to stormwater volume. If interim retention facilities are constructed within the PRSP and net SAP areas on parcels zoned for development, the development project would also be subject to payment of the retention fee, in order to fund construction of the ultimate regional retention facility.

Retention and detention facilities shall be designed in accordance with the requirements of the Placer County Storm Water Management Manual ~~and/or City of Roseville~~ standards that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division, and shall be shown in the improvement plans. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.9-5c on page 2-67 of the Draft EIR is revised as follows:

Mitigation Measure 4.9-5c: Prohibit grading within the 100-year floodplain (Net SAP Area and PRSP Area)

No grading activities of any kind may take place within the 100-year floodplain of the stream/drainageway unless approved and analyzed as part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). The location of the 100-year floodplain shall be shown on the Improvement Plans.

Prior to Improvement Plan approval and if required by the County Floodplain Administrator, the project proponent shall obtain from FEMA, a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area. A copy of the letter shall be provided to the Engineering and Surveying Division prior to approval of Improvement Plans. A Letter of Map Revision (LOMR), or a Letter of Map Revision based on Fill (LOMR-F) from FEMA shall be provided to the Engineering and Surveying Division prior to acceptance of project improvements as complete, or as otherwise approved for the Sac State–Placer Center site.

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, the impact summary for Impact 4.10-2 on page 2-68 of the Draft EIR is revised as follows:

Impact 4.10-2: Consistency and compatibility with the Western Regional Sanitary Landfill

The proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the WRSL from 1 mile (5,280 feet) to 2,000 feet for residential development~~, or 1,000 feet~~ with the approval of a specific plan, master plan, or development agreement. This proposed General Plan amendment could result in land use incompatibility due to residential development occurring closer to the WRSL in areas that would otherwise remain undeveloped under the current residential buffer policy. Based on review of existing data regarding nuisance complaints from residents beyond 1 mile, it is expected that new residents and users within the project area would complain about odor from the WRSL and that the number of

complaints lodged about nuisance odors would increase. Such complaints could create pressure for the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. Impacts relative to consistency and compatibility of proposed land uses with the WRSL would be potentially significant.

In response to comment 4-50, Mitigation Measure 4.11-4b on page 2-72 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-4b: Reduce exposure to new sensitive land uses from the existing Roseville Power Plant 2 (PRSP Area)

- Before approval of small-lot tentative maps, the project proponent shall demonstrate that the building occupants of new residential or other sensitive land use within the PRSP area are not exposed to noise levels from the RPP2 that exceed Placer County land use compatibility standards (e.g., 60 dBA L_{dn}/CNEL for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA L_{eq}/65 dBA L_{max} [night], 55 dBA L_{eq} /70 dBA L_{max} [day]).

- If achievement of the Placer County noise standards cannot be met by providing adequate setback of at least 590 feet from the RPP2 (i.e., distance at which nighttime L_{eq} standard is met), then the County shall require the developer to construct, at developer's costs, a sound wall ~~be constructed~~ between the existing RPP2 and any new sensitive receptors. ~~The sound wall shall be designed by an acoustical engineer and constructed and placed in a manner that achieves, at a minimum, a 5 dB reduction in sound.~~ The wall design shall be coordinated with the City of Roseville. The wall or a combination of wall and setbacks, shall result in achievement of Placer County noise standards.

In response to comment 4-18 and to clarify what type of concrete is required, Mitigation Measure 4.11-5a on pages 2-72 and 2-73 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-5a: Reduce noise levels associated with new, expanded, or extended roads (Net SAP Area and PRSP Area)

Before finalizing roadway design for roadway expansion or new roadway construction, a design-level acoustical study shall be prepared to identify specific roadway design considerations, which shall be incorporated into final road design and approved by Placer County for roadways that result in a substantial increase in noise identified by Tables 4.11-12, 4.11-13, and 4.11-14. Roadway segments outside of Placer County are excluded (Fiddyment Road extension, Foothills Boulevard extension, and Woodcreek Oaks Boulevard extension). The following design features shall be considered:

- Roadway design shall provide sufficient setback between occupied structures that are defined as sensitive land uses by Placer County (or planned future sensitive land uses) and the roadway to minimize noise exposure to the extent feasible.

- In locations where setback is not feasible to reduce noise levels at existing or planned future sensitive receptors, roadway design shall incorporate quiet pavement types such as rubberized asphalt concrete (RAC) achieving at least a 4-dB decrease in traffic noise where feasible.

- Where existing sensitive receptors are located such that neither setback, nor quiet pavement, can reduce traffic noise from new or expanded roads associated with the project, the County shall coordinate with property owners of the existing residences regarding installation of sound walls along property lines to minimize traffic noise to meet exterior noise standards (city or County, as applicable) and, if necessary to meet the 45-dBA interior noise standards, upgrading windows that face the new or extended roadway.

In response to comment 3-15 and to provide additional clarity regarding timing, Mitigation Measure 4.13-1b on pages 2-76 and 2-77 of the Draft EIR is revised as follows:

Mitigation Measure 4.13-1b: Fire stations (Net SAP Area and PRSP Area)

A minimum of two fire stations ~~shall be constructed~~ are needed to serve the net SAP and PRSP areas. Both fire stations will be located within the SAP/PRSP area and shall be fully funded and equipped. ~~The specific locations for the fire stations and fire station design will be identified in coordination with the Placer County Fire Department.~~ The first fire station already exists in the net SAP area and is known as Station #77. PRSP Parcel PR-71 has been identified for the second station or any parcel within the PRSP area with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. The fire station~~s~~ will be constructed as needed to serve development and maintain staffing ratios. Placer County Fire anticipates that the second fire station will be needed at approximately 25 percent buildout of the PRSP. The second fire station's location, design, and construction will be identified in coordination with Placer County Fire, and the fire station will be constructed as its necessity is determined by the County based upon development and staffing ratios. The timing and triggers for construction of the fire station are outlined in the PRSP Development Agreement. Funding shall be provided pursuant to Mitigation Measure 4.13-1a.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-2 on page 2-77 of the Draft EIR is revised as follows:

Impact 4.13-2: Increased demand for law enforcement services

Implementation of the project would allow for the development of more than 2,400 dwelling units in the net SAP area and more than 5,600 dwelling units in the PRSP area. In addition, on-campus housing for students, faculty, and staff may be provided. The increase in the number of residences and jobs in the project area would generate demand for at least 19 additional Placer County Sheriff officers, assuming the Sac State–Placer Center would provide its own law enforcement personnel and facilities. A sheriff's substation is currently planned as part of the Placer Vineyards Specific Plan and would serve the project area and would be designed to accommodate the additional officers generated by the project. Individual residential projects in the SAP area would pay the County Public Facilities Impact Fee toward their fair share of demand for law enforcement facilities in compliance with SAP Policies PFS-7.1 and PFS-7.2 and Placer County General Plan Policy 4.H.4. The Sac State–Placer Center would provide its own law enforcement personnel and facilities. Implementation of the project would increase demand for law enforcement services; because Placer County has policies in place to fund, staff, and maintain adequate law enforcement facilities and services, no adverse effect on such levels of service would occur; however, no specific funding mechanism are in place for the project. Therefore, the impact would be potentially significant.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-4 on page 2-78 of the Draft EIR is revised as follows:

Impact 4.13-4: Increased demand for library services

Implementation of the SAP would allow for development of more than 2,400 dwelling units, and the PRSP would create more than 5,600 dwelling units. In addition, on-campus housing for students, faculty, and staff may be developed. The increase in the number of residences in the project area would increase demand for library services from County libraries in Rocklin, as well as the nearest City of Roseville library. Individual residential projects in the project area would pay the County Public Facilities Impact Fee toward their fair share of demand for library facilities in compliance with SAP Policies PFS-1.2, PFS-2.1, PFS-2.2, and PFS-2.3 and Placer County General Plan Policies 4.A.2 and 4.A.5. The Sac State–Placer Center would provide its own library services. Because Placer County has policies place to fund, staff, and maintain adequate library facilities and services, no adverse

effect to library services would occur; however, no specific funding mechanism for the project are currently in place. The impact would therefore be potentially significant.

To provide additional interim library service, Mitigation Measure 4.13-4 on page 2-78 of the Draft EIR is revised as follows:

Mitigation Measure 4.13-4: Create or annex into a CFD for library services (Net SAP Area and PRSP Area)

Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a CFD, CSA Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding supplemental revenue for library facilities, operations, and maintenance. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for library services is in place to provide adequate library services to the net SAP area and PRSP area during all stages of development. The County will provide interim library services through one or more means, including usage of the Bookmobile to provide temporary library services, establishment of a satellite library office within SAP or immediately adjacent to, or establishment of a satellite office at 1000 Sunset Boulevard, Rocklin, CA 95677 or other equivalent means beginning at 25 percent buildout of the PRSP or as otherwise determined by the County. These interim library services may become permanent means to provide library services to the plan area if a regional library is not constructed to serve the plan area or a joint partnership with the University has not been agreed to, to provide library services to PRSP before buildout of 75 percent of the DUE's in the plan area or as determined by the County.

To provide a correction, Mitigation Measure 4.14-1a on page 2-80 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1a: Widen Sunset Boulevard to four lanes from PRSP boundary to Placer Corporate Drive/South Loop Road (~~Net SAP Area and~~ PRSP Area)

The Placer County Countywide CIP (Placer County 2018c) includes funding for the widening of Sunset Boulevard to four lanes from Cincinnati Avenue to SR 65. Prior to issuance of building permits, project proponents of development projects within the ~~SAP area, including the~~ PRSP area, shall pay the applicable countywide traffic impact fees that are in effect in this area (Sunset District) pursuant to the applicable ordinances and resolutions, which will provide funding towards this improvement. The constructing party shall be eligible for fee credits for the applicable countywide traffic impact fees, as determined by DPWF.

To provide a correction, Mitigation Measure 4.14-1b on page 2-81 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1b: Construct extension of Foothills Boulevard as a four-lane arterial between PRSP area and its current northern terminus in City of Roseville (Net SAP Area and PRSP Area)

In response to comment 4-73, the second full paragraph of Mitigation Measure 4.14-3 on pages 2-84 and 2-85 of the Draft EIR is revised as follows:

Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may

choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

In response to comment 4-73, the second full paragraph of Mitigation Measure 4.14-4 on pages 2-91 and 2-92 of the Draft EIR is revised as follows:

As with Mitigation Measure 4.14-3, Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

In response to comment 1-3, Mitigation Measure 4.14-10 on page 2-97 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-10: Contribute fair share of feasible physical improvements to freeway operations (Net SAP Area and PRSP Area).

Prior to building permit issuance, project proponents of individual development projects within the SAP area shall be responsible for the project's fair share of all feasible physical improvements necessary and available to reduce the severity of the project's significant traffic impacts to freeway operations as identified in this traffic analysis consistent with the policies and exceptions set forth in the Transportation and Circulation Element of the Placer County General Plan. This may include any, or some combination of, the following forms:

- Payment of impact fees to the South Placer Regional Transportation Authority (SPRTA) in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities funded through fees collected by the SPRTA for Tier 1 and/or Tier 2 projects. This includes the following transportation projects that would directly improve operations on SR 65 and I-80:

- SR 65 Widening, including auxiliary lanes and a mainline mixed-flow or HOV travel lane
- I-80/SR 65 Interchange, and
- I-80/Rocklin Road Interchange

- Payment of other adopted and applicable regional impact fees that would provide improvements to freeway facilities that are affected by multiple jurisdictions, such as the Highway 65 JPA Fee, which provides funding for interchange improvements along SR 65.

- Placer County shall coordinate with their regional partners to modify an existing or adopt a new regional fee program to include the improvements identified that will constitute the regions fair share toward the identified improvements. These improvements may include:

  - Add ramp metering to high occupancy vehicle (HOV) lane entrance ramps on SR 65
  - Add auxiliary lanes to SR 65

In response to several comments regarding proposed transportation-related GHG mitigation measures, Mitigation Measure 4.14-13a on pages 2-99 and 2-100 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-13a: Prepare a transit master plan for SAP area (Net SAP Area and PRSP Area)

The County shall prepare a transit master plan for the SAP area, including the PRSP area. The transit master plan will be a County-led effort but may also be done in collaboration with PCTPA when PCTPA updates its Long-Range Transit Master Plan. Roseville Transit will also be consulted. The transit master plan shall identify how transit service will be delivered to the SAP and ensure that the service adequately serves transit demand in the SAP. Transit service could include but would not be limited to car-sharing programs, neighborhood electric vehicle systems, and free or low-cost monthly transit passes.

To provide a correction, Mitigation Measure 4.14-15b on pages 2-100 and 2-101 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15b: Require dedication of right of way to widen Fiddyment Road to six lanes from Athens Avenue to E. Catlett Road (Net SAP Area ~~and PRSP Area~~)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area~~, including the PRSP area,~~ shall dedicate sufficient right-of-way to widen Fiddyment Road to 6 lanes from Athens Avenue to E. Catlett Road in the future.

To provide a correction, Mitigation Measure 4.14-15c on page 2-101 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15c: Require dedication of right-of-way to widen Sunset Boulevard to eight lanes from Placer Corporate Drive/South Loop Road to SR 65 (Net SAP Area ~~and PRSP Area~~)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area~~, including the PRSP area,~~ shall dedicate sufficient right-of-way to widen Sunset Boulevard to 8 lanes from Placer Corporate Drive/South Loop Road to SR 65 in the future. Any development proposed on parcels affected by the future 8 lane facility shall be required as a condition of approval to provide an irrevocable offer of dedication to Placer County for a highway easement to accommodate the future 8 lane roadway improvements.

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area, the impact summary on page 2-110 of the Draft EIR is revised as follows:

Impact 4.15-4: Increased demand for wastewater treatment services

The wastewater flows generated by buildout of the PRSP and net SAP areas are estimated to be 1.99 and ~~3.78~~ 3.8 mgd, respectively, for a combined total of 5.77 mgd ADWF. The PGWWTP currently treats 7.1 mgd ADWF, has an operating treatment capacity of 9.5 mgd ADWF, and is permitted to discharge 12 mgd ADWF in compliance with its NPDES Permit. The plant has available capacity to treat an estimated 2.4 mgd. While wastewater flows from the PRSP area alone could be treated at the PGWWTP, the wastewater collection system would be designed to convey combined buildout flows from both the net SAP and PRSP areas to the PGWWTP. Therefore, any volume beyond that allowed by the PGWWTP's existing NPDES permit would be require additional capacity and a new permit that would identify wastewater treatment requirements. Wastewater flows from the PRSP area would not cause permit limits to be exceeded, but the PGWWTP would not have sufficient capacity to treat the estimated combined wastewater flows from buildout of the net SAP and the PRSP areas. Placer County requires project proponents to obtain written confirmation from SPWA to demonstrate that wastewater treatment services would be provided. While wastewater treatment capacity is sufficient in the nearer term to accommodate buildout of the PRSP area (over approximately 20 years), it is currently insufficient to serve treatment needs from ultimate buildout of the net SAP (over approximately 80 years) and PRSP areas. The project's wastewater flows would require eventual expansion of the PGWWTP. The impact of increased demand for wastewater treatment services would be significant.

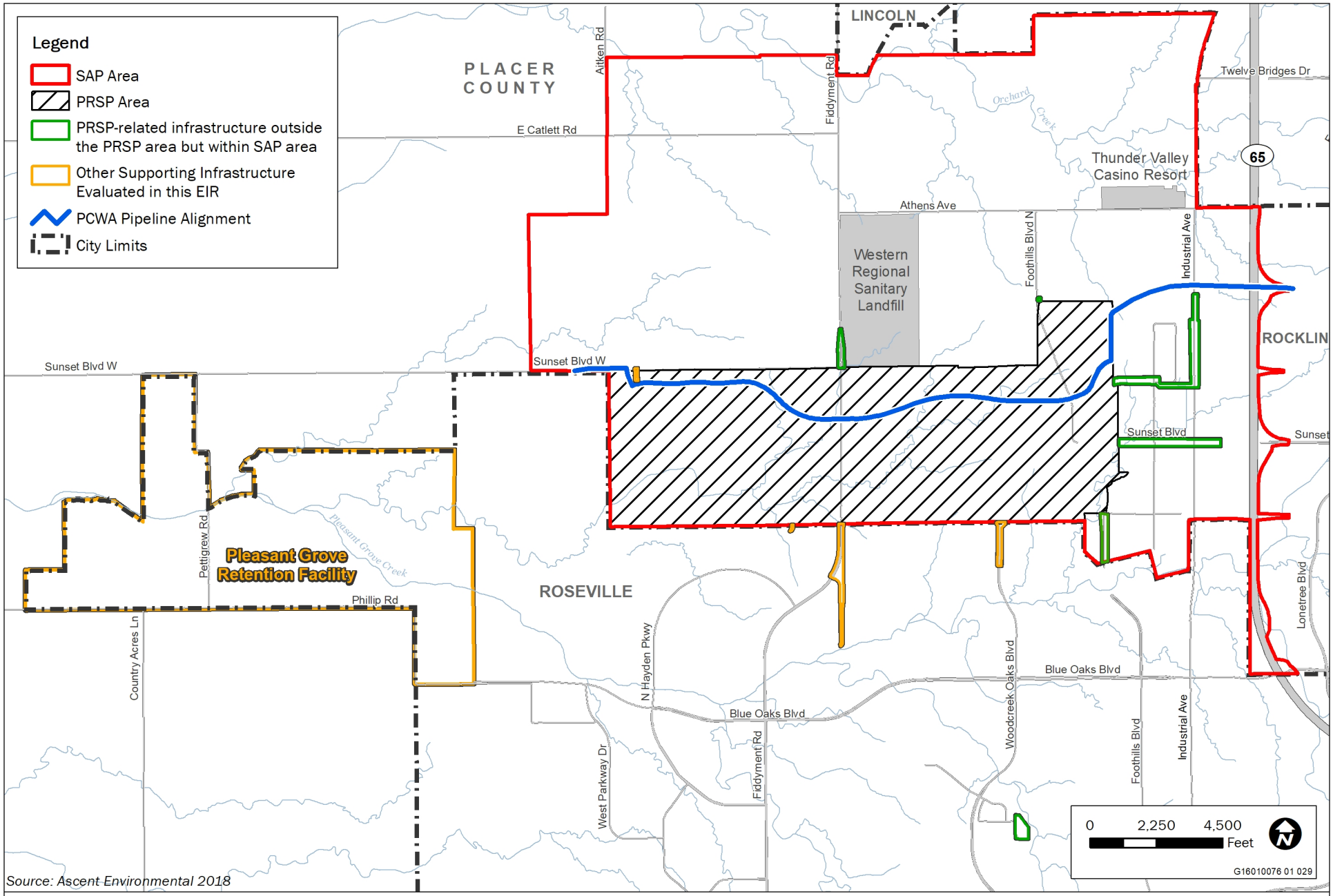
To provide a correction, the impact summary for Impact 4.15-7 on page 2-112 of the Draft EIR is revised as follows:

Impact 4.15-7: Increased demand for electricity

Implementation of the SAP, including the PRSP, would increase demand for electricity by bringing new residential and non-residential electricity users to the area. The increased demand for electricity could require additional electricity generation and transmission facilities, as well as the need for distribution infrastructure. PG&E has existing and planned substations in the SAP area that would have sufficient capacity to serve the new development in the net SAP and PRSP areas. Distribution infrastructure would be installed concurrently with net SAP and PRSP development, thereby reducing potential environmental impacts. Pioneer Community Energy recognizes the additional electric generation service needed to service the increased demand. The impact would be less than significant.

2.1.3 Revisions to Chapter 3, "Project Description"

In response to comment 4-24 and to provide an updated exhibit that reflects the annexation of the Amoruso Ranch Specific Plan into the City of Roseville boundaries, which was approved by the Placer County Local Agency Formation Commission in December 2018, as well as to correct the PCWA pipeline alignment within the PRSP area, Exhibit 3-3 on page 3-4 of the Draft EIR is revised as follows: [see following page]



Source: Ascent Environmental 2018

Revised Exhibit 3-3

Project Area

ASCENT ENVIRONMENTAL

In response to comment 31-8 and to provide a correction to the number of hotel rooms at Thunder Valley Casino Resort, the second paragraph on page 3-5 of the Draft EIR is revised as follows:

> There have, however, been some business expansions and new development activity during this time within the plan area. Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the largest new development activity within the plan area since 1997, having expanded to become a full-service casino with a ~~297~~408-room hotel, spa, concert, and gaming facility. Additionally, some core industrial uses have started to take hold in the southeastern corner of the plan area.

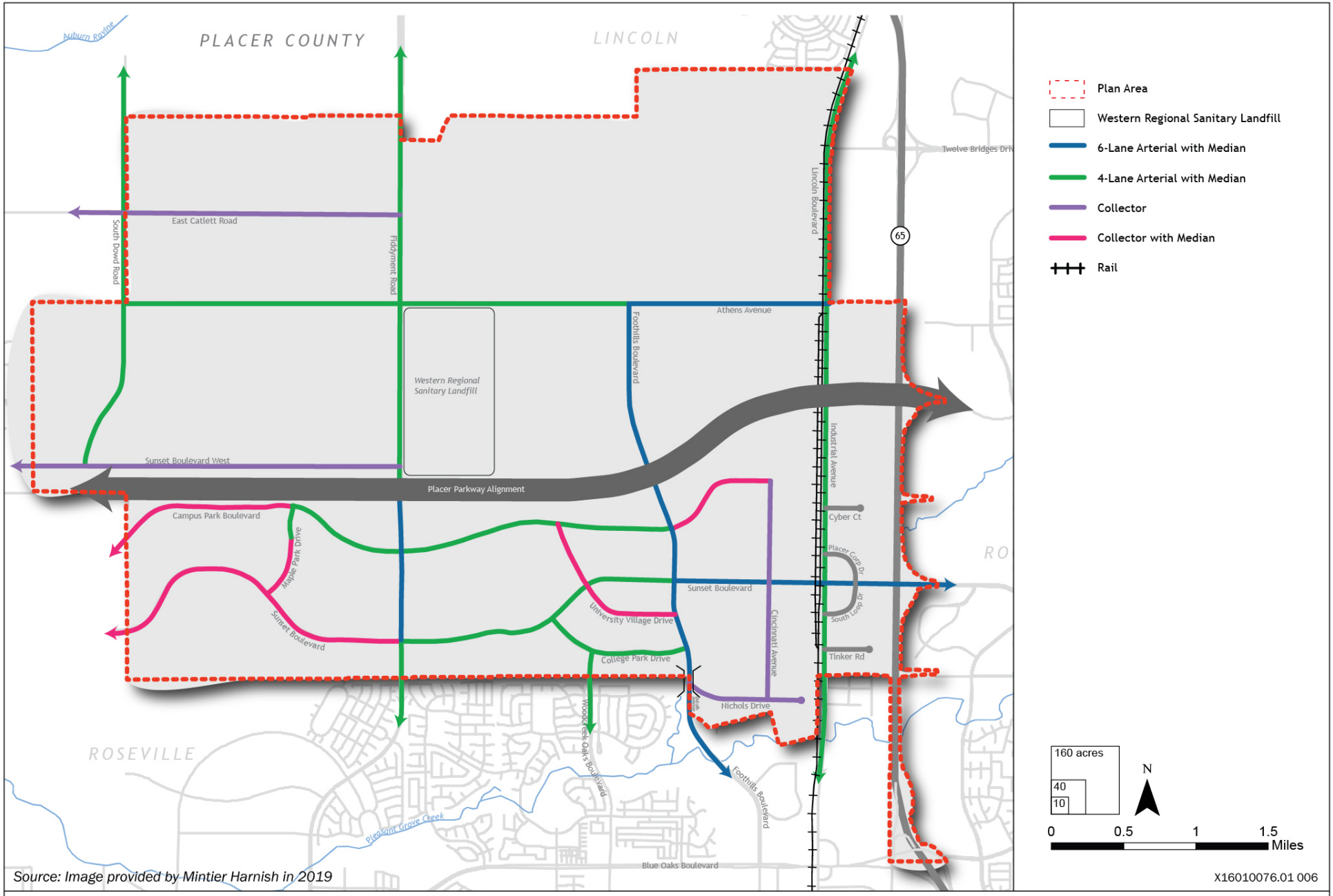
To correct a discrepancy and in response to comment 31-9, Table 3-1 on page 3-15 of the Draft EIR is revised as follows:

Table 3-1 SAP Development Density by Land Use Designation

Land Use Designation	Acres	Floor Area Ratio		Dwelling Units per Acre
		Low	High	
General Commercial	34.2	0.15	0.75	–
Entertainment Mixed-Use	516.8	0.15	~~1.00~~ 2.00	10-30
Business Park	147.3	0.20	0.50	–
Innovation Center	1,244.7	0.20	0.50	10-30
Eco-Industrial	927.4	0.20	0.60	–
Light Industrial	749.9	0.20	0.50	10-30
Public Facility	6.3	–	–	–
Preserve/Mitigation Reserve	1,943.4	–	0.02	–
Urban Reserve	320.4	–	0.02	–
PRSP	2,213.3	See Table 3-4	See Table 3-4	See Table 3-4
Total	**8,103.7**			

Source: Information provided by Mintier Harnish in 2017

To provide a revised circulation diagram for the Sunset Area Plan that reflects the following changes (1) changed University Village Drive in Placer Ranch to be a Collector with Median and (2) added label for Duluth Avenue to show it as the connection between Foothills Boulevard in the Sunset Area and Foothills Boulevard in Roseville, Exhibit 3-7 on page 3-23 of the Draft EIR is revised as follows: [see following page]



Source: Image provided by Mintier Harnish in 2019

Revised Exhibit 3-7

Circulation Diagram

ASCENT ENVIRONMENTAL

In response to comments 4-80 and 4-81 and to provide additional clarity, the second paragraph on page 3-26 of the Draft EIR is revised as follows:

> **SAP Potable and Recycled Water Systems**
> The *Sunset Area Water, Wastewater, and Recycled Water Technical Report* was prepared by Psomas in 2017 to evaluate the wet utilities infrastructure needed to serve buildout of the SAP area. (Note that separate master plans were prepared for the PRSP's potable and recycled water systems.) As indicated in this report (included as Appendix B), the Placer County Water Agency (PCWA) is the water wholesaler and retailer for customers within the Sunset Area. The Sunset Area is located within PCWA's lower Zone 6 service area. Recycled water would be provided by PCWA as the retailer with the City of Roseville as the wholesaler providing recycled water from the Dry Creek Wastewater Treatment Plant and Pleasant Grove Wastewater Treatment Plant (PGWWTP). The City of Roseville provides recycled water to customers on a first-come, first-served basis. The City of Roseville would provide the County an opportunity to reserve recycled water supply prior to development under the SAP/PRSP, as considered in the December 2009 South Placer Regional Wastewater Systems Evaluation Final Report. Projected flows and anticipated pipeline diameters and locations are described in detail in the technical study included as Appendix B. Off-site pipeline extensions are identified in Exhibit 3-3 above. The recycled water system would require a reevaluation of the recycled water availability at the time of connection of individual developments. If improvements are needed, they would be funded by those developments.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 3-4 on page 3-34 of the Draft is revised as follows:

Table 3-4 PRSP Land Use Designation Summary

Land Use Designation	Acres	% of Total Acres	Floor Area/ Dwelling Units	% of Total Units
University, Employment, and Commercial Uses				
University (UZ)[1]	301.3	13.6	3,000,000 sq. ft.	–
Campus Park (CP)	335.0	15.1	4,506,282 sq. ft.	–
General Commercial (GC)	22.7	1.0	296,513 sq. ft.	–
Commercial Mixed Use (CMU)[1][2]	48.8	2.2	637,718 sq. ft.	–
Subtotal	707.7	32.0	8,440,513 sq. ft.	–
Residential Uses				
Low Density Residential (LDR)	446.0	20.2	2,210 du	39.2
Low Density Residential— Age-Restricted (LDR-A)	183.1	8.3	1,050 du	18.6
Medium Density Residential (MDR)	112.3	5.1	872 du	15.5
High Density Residential (HDR)[1][2]	60.0	2.7	1,504 du[1]	26.7
Subtotal	801.4	36.2	5,636 du	100.0
Public, Parks, and Open Space Uses				
Public Facilities - Schools (PF)	32.7	1.5	–	–
Public Facilities – County (PF)	10.3	0.5	–	–
Parks and Recreation – Active Parks (PR)	69.8	3.2	–	–
Open Space – Paseos & Preserves (OS)	264.8	12.0	–	–
Subtotal	377.5	17.1	–	–
Other				
Placer Parkway (ROW)	158.5	7.2	–	–
Major Roads/Landscape (HE/LSE)	168.1	7.6	–	–
Subtotal	326.6	14.8	–	–

Total	2,213.3	100.0	8,440,513 sq. ft./ 5,636 du	100.0

Notes: du = dwelling units; sq. ft. = square feet.

Some subtotals and totals do not sum precisely because of rounding.

[1] UZ to house up to 5,000 students and 200 faculty

~~1~~[2] 300 reserve units are included in the HDR unit total, which are permitted to be allocated to any parcel in the Town Center district, including CMU parcels located outside of the landfill buffer.

Source: Information provided by MacKay & Somps in 2018

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first sentence on page 3-35 of the Draft EIR is revised as follows:

> Exhibit 3-~~8~~10 shows the conceptual campus plan, which illustrates the three general land uses identified for the Sac State–Placer Center. The approximate location of Phase I of the University Development is depicted on Exhibit 3-12:

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first full paragraph on page 3-39 of the Draft EIR is revised as follows:

> **Open Space.** The OS designation is applied to paseos and preserves. Open space paseos are fully landscaped and function as linear parks, with informal play spaces, sitting areas, and shared-use paths that link parks and schools. Paseos are generally sited within residential neighborhoods. Open space preserves consist of land areas where drainage ways and/or environmentally sensitive habitat is to be preserved in perpetuity. These areas may contain hazards, natural features, or human-made features. Open space areas provide passive recreation opportunities, pedestrian/bike paths, preservation of wetland resources, viewsheds, flood water conveyance and detention, and stormwater quality treatment/filtration features. Although not designated as OS, the University site would include ~~contains~~ approximately 58 acres of open space ~~preserve areas~~ that may function similarly as other preserves in the plan area. The open space preserves within the University site ~~are~~ would be integrated into the system of preserves in the remainder of the plan area and are a significant component of the PRSP's open space network.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 3-8 on page 3-43 of the Draft EIR is revised as follows:

Table 3-8 PRSP Student Generation Estimates

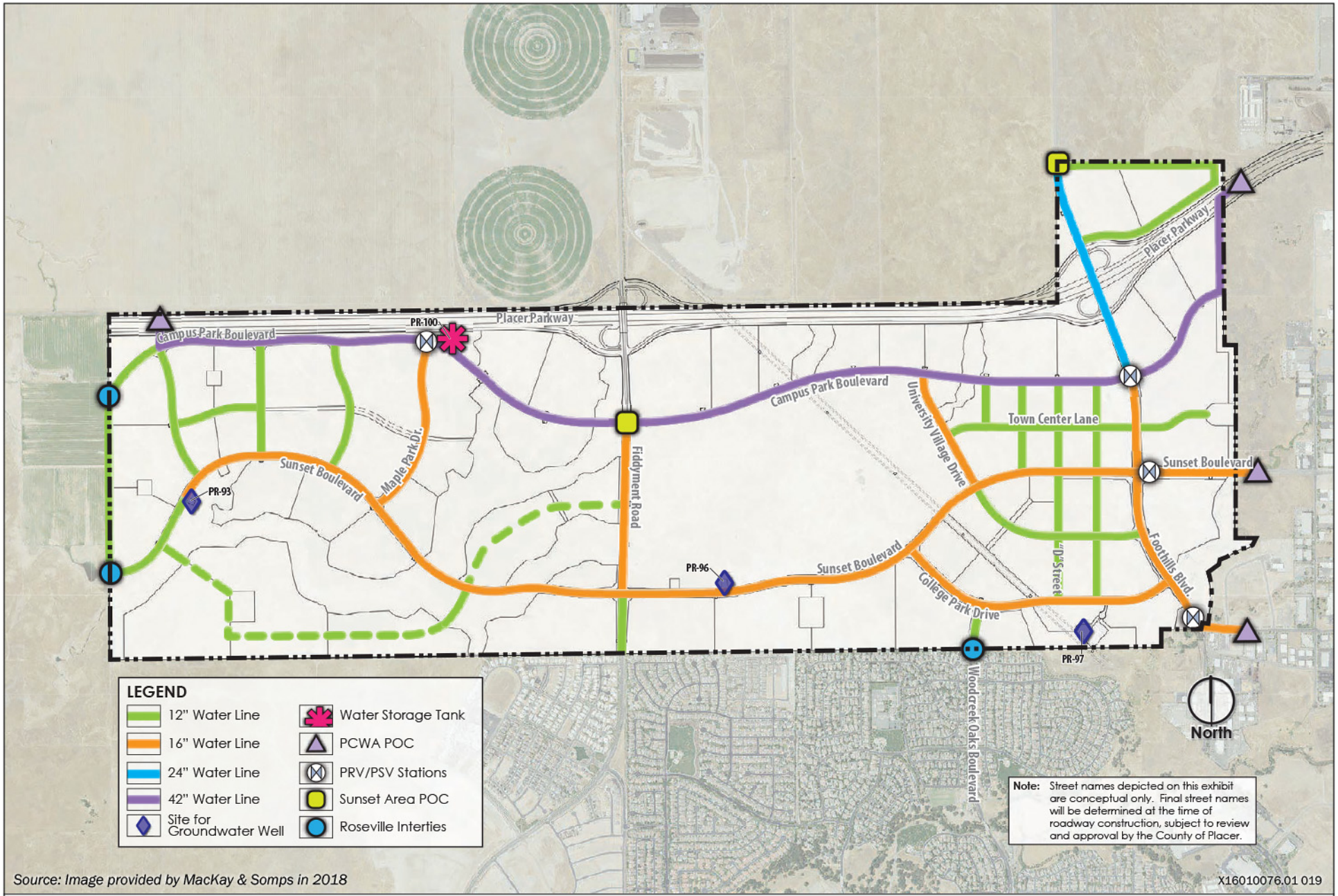
	LDR/MDR Factor[1]	HDR/CMU Factor[1]	Students Generated	School Capacity	Schools Required
Roseville City School District[2]					
Elementary School (Grades K–5)	0.3329	0.1118	1,194	800	1.49
Middle School (Grades 6–8)	0.1164	0.0352	412	1,000	0.41
Roseville Joint Union High School District[2]					
High School (Grades 9–12)	0.161	0.036	550	1,800	0.31

Notes:

1. Student generation rates provided by Roseville City School District and Roseville Joint Union High School District.
2. Estimates assume 3,082 LDR/MDR units and 1,504 HDR/CMU units for basis of calculations. Age-restricted and Sac State–Placer Center units not included in total.

Source: Information provided by MacKay & Somps in 2018

In response to comment 7-3 and to provide an updated exhibit that shows the Sunset Area Point of Connection (POC) at the west area and to relabel all PCWA connections as POCs, not interties, Exhibit 3-19 on page 3-52 of the Draft EIR is revised as follows: [see following page]



Source: Image provided by MacKay & Somps in 2018

X16010076.01 019

Revised Exhibit 3-19

PRSP Potable Water Infrastructure

ASCENT ENVIRONMENTAL

In response to comment 7-6, the ninth paragraph on page 3-53 of the Draft EIR is revised as follows:

> The City of Roseville provides wholesale recycled water to PCWA, which ~~would~~ is anticipated to serve as the recycled water retailer for the PRSP area pending further discussion and agreement with the County. All recycled water improvements would be constructed consistent with PCWA and Placer County standards or City of Roseville standards for those lines located in the City of Roseville. Construction of PRSP recycled water infrastructure would be phased as needed to support development, with specific timing and funding obligations detailed in the *Placer Ranch Development Agreement*. Detailed information about the PRSP recycled water facilities and supplies, including technical analysis, is contained in the *Placer Ranch Recycled Water Master Plan* (Appendix G).

In response to comment 13-1 and to provide clarity regarding drainage, the second paragraph on page 3-58 of the Draft EIR is revised as follows:

> Peak stormwater flows between the 2-year, 24-hour and the 100-year, 24-hour storm events would be attenuated within the University Creek corridor using overbank flow areas. These areas coincide with proposed culvert crossings of the creek where crossings could detain flows as needed for flood control. ~~Although the 200-year, 24-hour event would not be attenuated, t~~These crossings have also been sized to allow this event to be conveyed without overtopping the roadways or flood the adjacent developable areas within the plan area. Portions of the PRSP area that drain to Orchard Creek and the Pleasant Grove Creek North Branch include proposed detention basins that would attenuate flows from the 2-year to the 100-year event.

To reflect a changed project condition (that an easement has been secured since release of the Draft EIR), the sixth paragraph on page 3-58 of the Draft EIR is revised as follows:

> To minimize impacts associated with increases in stormwater volume within the Auburn Ravine watershed, retention is proposed to occur either on-site, in the existing City of Lincoln Lakeview Farms retention basin, or in a proposed retention basin that could be constructed on the Scilacci Farms property, for which the County ~~is currently working to secure an easement~~ secured an easement which includes language allowing for flood control. A feasibility study has been conducted that confirms that any of these retention basin options could provide the needed capacity. Although the Lakeview Farms retention basin has undergone CEQA review and is available for retention, further project-level CEQA analysis would be required before the Scilacci Farms property could be used for retention purposes.

To provide a correction, the fourth paragraph on page 3-61 of the Draft EIR is revised as follows:

> **Electric Service**
> Electric~~ity~~ transmission and delivery service for the plan area is provided by PG&E~~, and~~. Pioneer Community Energy, a community choice aggregator, is the default electric generation service provider, with customers provided the opportunity to opt to PG&E generation service. PG&E would continue to provide electric~~ity~~ transmission and delivery service for development identified in the PRSP, while Pioneer Community Energy would continue to provide electric generation service. At full buildout, the PRSP peak electric demand is estimated to be 80.3 megavolt amperes (MVA). Proposed electric facilities consist of 600-amp mainline backbone feeder circuits extending throughout the major roads, and smaller local circuits extending from the backbone feeder circuits and running through the neighborhoods.

In response to comment 4-33, the last paragraph on page 3-69 of the Draft EIR is revised as follows:

> To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, including costs associated with property acquisition, environmental review, design construction, operation, and maintenance, a fee

program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. To clarify the scope of the NEPA document requirement, the bulleted list of required permits and approvals on page 3-73 of the Draft EIR is revised as follows:

The following approvals and permits are required from other agencies to implement the proposed PRSP:

- approval of a NEPA document for the PRSP (USACE),
- Section 404 Individual Permit (USACE),
- Section 7 Consultation (USFWS and National Marine Fisheries Service),

...

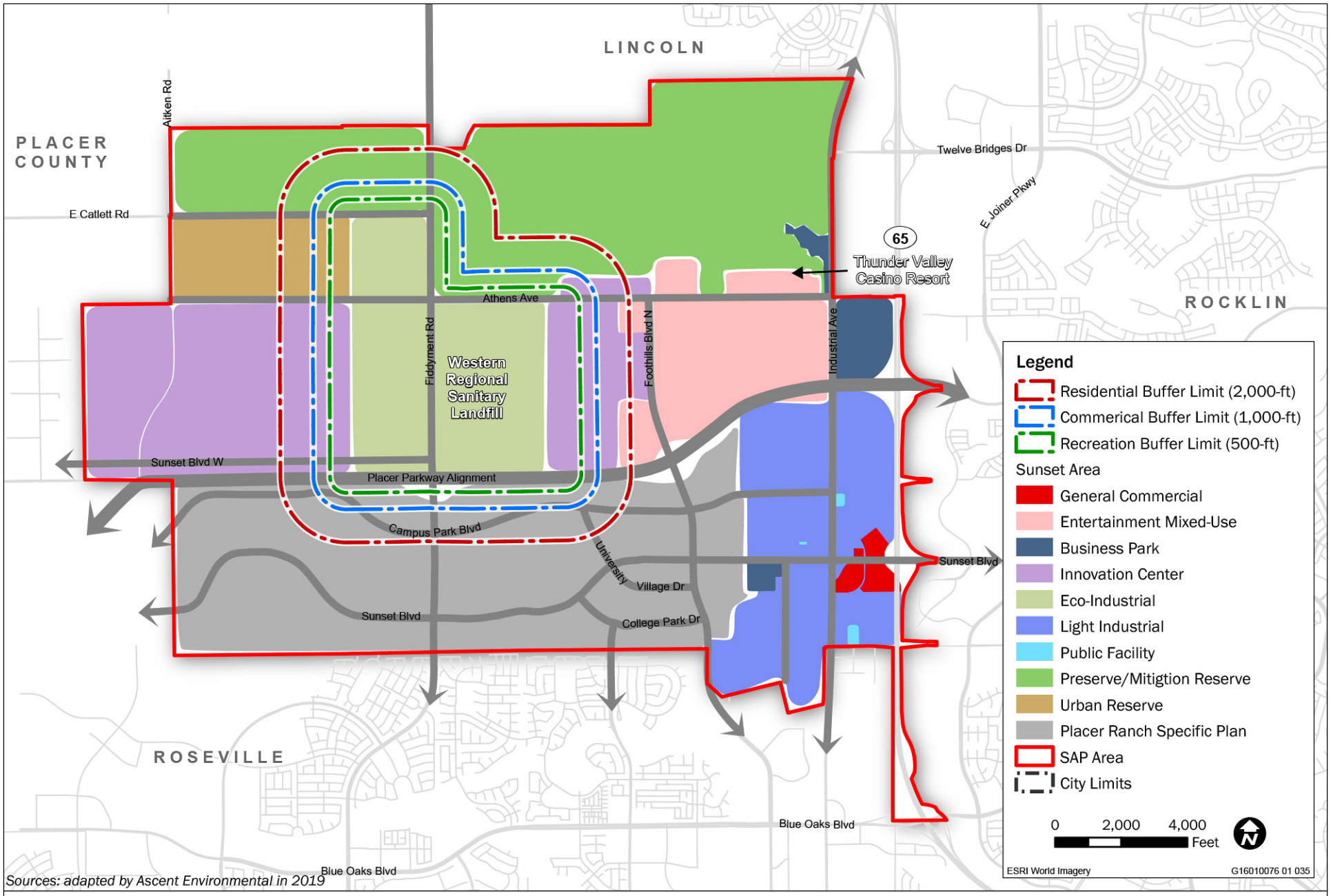
As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The bulleted list of required permits and approvals on page 3-73 of the Draft EIR is revised as follows:

- Section 1602 Streambed Alteration Agreement (CDFW),
- amendment of the Wastewater Service Area boundaries (South Placer Wastewater Authority and local agency formation commission), ~~and~~
- agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility~~.~~, and
- approvals and permits through CSU for development of the Sac State–Placer Center.

In response to comment 31-13 and to show the location of the SAP proposed sanitary landfill buffers, the first sentence on page 3-74 of the Draft EIR has been revised as follows: [see following page]

PROPOSED REVISIONS TO BUFFER LIMIT

Table 1-5 and Goal 4.G of the *Placer County General Plan* would be revised as follows (see Exhibit 3-27):



Sources: adapted by Ascent Environmental in 2019

Exhibit 3-27 **Proposed Land Use Buffers**

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. The following revision is therefore made to note 5 at the bottom of Table 1-5 [from the County General Plan] as shown on page 3-74 of the Draft EIR:

Placer County General Plan Table 1-5 Minimum Public Facility Buffer Zone Standards Width

Type of Public Facility	Minimum Buffer Zone Width (feet) by Land Use ~~Designation~~ Type			
	Residential	Commercial	Industrial	Recreation
Airport [1]	2,000	1,000 [2]	0	0 - 500 [3]
Sewage treatment plant	1,000	1,000	0 - 500 [4]	1,000
Solid waste transfer station	500	0	0	500
Solid waste disposal site	~~5,280~~2,000 [5]	1,000 [6]	0	500 [6]

1. See also comprehensive land use plans (CLUPs) for airports.
2. Buffer required for non-airport related commercial uses only.
3. No separation necessary for expansive, low-population outdoor recreation facilities such as golf courses; 500 feet for places of public assembly, outside of aircraft overflight areas.
4. No separation necessary for warehousing uses with a low employee-per-square foot ratio; 500 feet required for manufacturing facilities and business parks.
5. ~~Policy 4.G.11 protects landfill facilities from future residential encroachment by requiring a residential buffer of one mile 2,000 feet measured from the property line of an active or future landfill site. Residential uses may be considered on a case-by-case basis to be as close as 1,000 feet with approval of a specific plan, master plan, or development agreement.~~ All new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. See Placer County Sunset Area Plan for specific standards related to residential uses proposed within 1 mile and 2,000 feet of the Western Placer Regional Landfill.
6. Commercial and recreation uses within the specified buffer zones may be considered on a case-by-case basis with approval of a specific plan, master plan, or development agreement.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The last paragraph on page 3-77 of the Draft EIR is revised as follows:

> Any future development projects within the Sunset Area would be subject to the standards in the *Sunset Area Plan Implementing Zoning Regulations* and the *Placer County Zoning Ordinance*, and, accordingly, all development projects would require review and approval of subsequent permits and entitlements by Placer County as set forth therein (e.g., subdivision review, design review, conditional use permits, variances, and/or other permits). As discussed in Chapter 1, "Introduction," once the Sac State–Placer Center property is accepted by the Board of Trustees of the CSU, Placer County would no longer have jurisdictional authority over the site.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The fourth paragraph on page 3-78 of the Draft EIR is revised as follows:

> Environmental Review
> All applications for development entitlement for projects within the plan area that are submitted after approval of the SAP and PRSP would be required to be reviewed for conformity with the SAP and (as applicable) the PRSP, excluding development of the Sac State–Placer Center property if owned by the Board of Trustees of the CSU. These development entitlements would also require review for compliance with CEQA, Public Resources Code Section 21000 et seq. This EIR is intended to serve as the base environmental document for subsequent entitlement approvals within the plan area. As discussed in Chapter 1, "Introduction," this EIR evaluates the Sac State–Placer Center at a programmatic level of detail and CSU would conduct its own project-specific environmental review of

development of the site. It should be noted that under Section 65457(a) of the California Government Code and State CEQA Guidelines Section 15182, any residential development project, including any subdivision, that is undertaken to implement and is consistent with a specific plan is exempt from additional CEQA review.

2.1.4 Revisions to Section 4.0, "Approach to the Environmental Analysis"

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4-2 of the Draft EIR is revised as follows:

As a state entity, the CSU is not required to obtain development approvals from Placer County or other local agencies and would serve as its own lead agency pursuant to CEQA and would administer campus project permitting. While this EIR provides substantial analysis of the university campus based on the information available (i.e., conceptual campus plan, land use and facility types, approximate floor area, and approximate student and employee numbers), the university has yet to develop a master plan for the campus, which would detail its strategic vision; design goals, recommendations, and strategies for the physical elements of the campus; a land and building program, which would describe building types, locations, and sizes necessary to support the university's functions and projected enrollment; and other details, including parking, energy and sustainability, site-specific infrastructure, support facilities, and the like. Therefore, this EIR analyzes the Sac State–Placer Center portion of the PRSP at a program level. This EIR can provide CEQA tiering opportunities to the state, and the university—will need to assess its proposed project -at such time those details are developed- in light of the information in this EIR, determine the degree to which its actions are covered, summarize or incorporate by reference relevant portions of this EIR, and evaluate environmental effects that were not sufficiently addressed by the program-level analysis. A master plan would be required for university development at this location.

2.1.5 Revisions to Section 4.1, "Aesthetics"

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The third full paragraph on page 4.1-26 of the Draft EIR is revised as follows:

Conclusion

Existing General Plan policies and proposed policies and design guidelines would emphasize use of less-reflective surfaces and orientation of buildings, as well as other lighting requirements, to limit the adverse effects associated with the creation of new sources of substantial glare. Although lighting would be minimized to the extent possible as a result of existing and proposed General Plan policies, including the directional requirements, capping of light standards, and minimizing spillover, the sheer quantity of lighting would create a new source of light pollution related to the substantial source of light across the project area. It should be noted that County policies would not apply to the Sac State–Placer Center, which would be a substantial source of nighttime lighting, including a stadium. As a result, nighttime lighting impacts would be potentially significant. No feasible mitigation, beyond the policies and design measures, would be available to prevent the cumulative effect of light across the entire project area. Therefore, the impact related to nighttime lighting would be **significant and unavoidable.**

2.1.6 Revisions to Section 4.2, "Agricultural Resources"

No revisions are needed.

2.1.7 Revisions to Section 4.3, "Air Quality"

REVISIONS RESULTING FROM THE *"FRIANT RANCH"* DECISION

On December 24, 2018, during the public review period of the SAP/PRSP Draft EIR, the California Supreme Court published decision S219783, *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (herein referred to as the Friant Ranch Decision), which overturned the County of Fresno's approval of the Friant Community Plan Update and Friant Ranch Specific Plan EIR, confirming some of the findings of the 5th District Court of Appeal's decision (226 Cal.App.4th 704). The decision addressed, in part, the EIR's air quality analysis and approach to disclosing a potential connection to human health impacts.

Consistent with standard CEQA practice and as recommended by the San Joaquin Valley Air Pollution Control District (SJVAPCD), the Friant Ranch EIR estimated emissions of criteria pollutants and ozone precursors in tons per year and compared these to the applicable mass emissions thresholds of significance as developed by SJVAPCD. Emissions of reactive organic gases (ROG) and oxides of nitrogen (NO_X) (which combine in the atmosphere to form ground-level ozone, a criteria air pollutant), as well as respirable particulate matter (PM_{10}), exceeded the SJVAPCD's thresholds of significance for these pollutants. As a result, project-related air quality impacts were determined to be potentially significant. Following the application of all feasible mitigation measures, air quality impacts were still found to be potentially significant and unavoidable.

The Court found that the air quality analysis lacked sufficient detail to enable readers to fully understand the nature and magnitude of impacts. It also failed to make a reasonable effort to connect the project's air quality impacts to human health effects or explain why such a connection was not feasible. The Court expressed that it is not an adequate analysis under CEQA to simply produce quantitative estimates of air pollutants and disclose that such estimates would result in a significant impact when compared to the state and federal standards; therefore, CEQA practitioners should make a good faith effort to explain why a certain level of air pollution within a specific air basin would be called significant and should describe the meaning of a significant impact to the reader in meaningful terms, such as the locations and receptors affected and potential health implications, if possible.

In light of this recent Supreme Court case, County staff has initiated the following changes to Section 4.3, "Air Quality," to provide clarity regarding the relationship between emission of criteria air pollutants and public health effects.

The following new text is added to page 4.3-14 of the Draft EIR following the discussion of Toxic Air Contaminants and prior to the heading "Compostable Materials Handling Operations and Facilities":

> **Sierra Club v. County of Fresno**
>
> In December 2018, the California Supreme Court issued its decision in *Sierra Club v. County of Fresno* (2018) (6 Cal.5th 502). The case reviewed the long-term, regional air quality analysis contained in the EIR for the proposed Friant Ranch development. The project is located in unincorporated Fresno County within the San Joaquin Valley Air Basin, an air basin currently in nonattainment for multiple NAAQS and CAAQS, including ozone and PM. The Court ruled that the air quality analysis failed to adequately disclose the nature and magnitude of long-term air quality impacts from emissions of criteria pollutants and precursors "in sufficient detail to enable those who did not participate in its preparation to understand and consider meaningfully the issues the proposed project raises." The Court noted that the air quality analysis did not provide a discussion of the foreseeable adverse effects of project-generated emissions on Fresno County's likelihood of exceeding the NAAQS and CAAQS for criteria air pollutants nor did it explain why it was not "scientifically possible" to determine such a connection. The Court concluded that "because the EIR as written makes it impossible for the public to translate the bare numbers provided into adverse health impacts or to understand why such translation is not possible at this time," the EIR's discussion of air quality impacts was inadequate.

To clarify that PCAPCD's thresholds are ultimately tied to public health, pages 4.3-20 and 4.3-21 of the Draft EIR are revised as follows:

STANDARDS OF SIGNIFICANCE

Based on the Placer County CEQA checklist and Appendix G of the State CEQA Guidelines, a project would result in a potentially significant impact on air quality if it would:

- conflict with or obstruct implementation of the applicable air quality plan;
- violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under any applicable NAAQS or CAAQS (including releasing emissions that exceed mass emission level standards for ozone precursors);
- expose sensitive receptors to substantial pollutant concentrations (including TACs); or
- create objectionable odors affecting a substantial number of people.

As stated in Appendix G of the State CEQA Guidelines, the significance criteria established by the applicable air district, in this instance PCAPCD, may be relied upon to make the above determinations. PCAPCD has developed guidance for use by lead agencies when preparing CEQA documents (PCAPCD 2017a). PCAPCD has adopted CEQA thresholds of significance for evaluating impacts to air quality. CEQA-related air quality thresholds of significance are tied to achieving or maintaining attainment designations with the NAAQS and CAAQS, which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health. PCAPCD significance criteria are substantially similar to those of Appendix G, but with some additional specificity.

PCAPCD identified numerical thresholds for project-generated emissions of criteria air pollutants and precursors that would determine whether a project's discrete emissions would result in a cumulative, regional contribution (i.e., significant) to the baseline nonattainment status of the air basin. PCAPCD's quantitative thresholds of significance for project-level CEQA evaluation are used to determine the extent to which a project's emissions of criteria air pollutants and precursors would contribute to regional degradation of ambient air quality within the air basin. In its CEQA Thresholds of Significance Justification Report, PCAPCD indicates that development of its mass emissions thresholds considered (PCAPCD 2016:5):

- The current emission offset requirement required by PCAPCD's new source review rule.
- The regional goal to attain the NAAQS and CAAQS.
- The historical CEQA projects reviewed by PCAPCD from 2003 to 2015.
- The CEQA significance thresholds adopted by other air districts in the Sacramento Area.

As a nonattainment area under the NAAQS and CAAQS, PCAPCD must prepare a SIP, which serves as a comprehensive plan that describes how state and local measures will attain air quality standards. Within the SIP, PCAPCD develops an emissions inventory for nonattainment areas to determine to what extent various sources within the area are responsible for emissions of criteria pollutants and ozone precursors. Baseline emissions are established, and a trajectory to attainment based on expected growth rate of population, housing, industrial/commercial activity, energy use, and motor vehicle travel is developed (PCAPCD 2016:7).

PCAPCD's mass emissions CEQA thresholds represent a portion of land use emissions budgeted for in the SIP. Based on the above considerations, PCAPCD has determined that projects that emit

criteria air pollutants and ozone precursors below these thresholds would not impede PCAPCD's capacity to attain the NAAQS and CAAQS under the emissions inventory found the in the SIP. As discussed in Sections 4.3.2, "Environmental Setting," and 4.3.3, "Regulatory Setting," the NAAQS and CAAQS were developed in consideration of extensive scientific and economic review and represent concentrations of criteria air pollutants that provide public health protection, including protecting the health of sensitive populations such as asthmatics, children, and the elderly.

As such, for the purpose of this analysis, the following thresholds of significance are used to determine if project-generated emissions would produce a considerable level of air pollutants that would impede PCACPD's capacity to attain the NAAQS and CAAQS at the regional level and/or result in localized air quality impacts. For the reasons discussed above, if the project would generate emissions below these thresholds, the projects contribution of air pollutants would not inhibit PCAPCD achieving attainment under the NAAQS and CAAQS; thus the potential for an adverse human health impact would be avoided. As identified by PCAPCD, an air quality impact is considered significant if implementation of the project would result in (PCAPCD 2017a):

- construction-generated criteria air pollutant or precursor emissions that would exceed the PCAPCD-recommended threshold of 82 pounds per day (lb/day) for ROG, NO_X, or PM_{10} (PCAPCD 2017a:21), or operation-related (regional) emissions of ROG or NO_X that exceed a mass emission threshold of 55 lb/day, and emissions of PM_{10} that exceed 82 lb/day. While PCAPCD has not established a mass emission threshold for $PM_{2.5}$, which is a subset of PM_{10}, this analysis considers project-generated emissions of $PM_{2.5}$ to be significant if PCAPCD's thresholds for PM_{10} are exceeded (PCAPCD 2017a:21);

- long-term operational local mobile-source CO emissions that would result in an exceedance of the NAAQS and CAAQS for CO (PCAPCD 2017a:21);

- exposure of sensitive receptors to TAC emissions, from a single source, that would exceed 10 in 1 million for the carcinogenic risk (i.e., the risk of contracting cancer) or a noncarcinogenic Hazard Index of 1 for the maximally exposed individual (PCAPCD 2017a:58–62); or

- creation of an objectionable odor affecting a substantial number of people.

Page 4.3-23 of the Draft EIR is revised as follows:

~~Health Risk~~Toxic Air Contaminants

Health risks from project-generated construction- and operational-related emissions of TACs were assessed qualitatively. This assessment is based on the location from which construction- or operational-related TAC emissions would be generated by land uses developed under the project relative to nearby sensitive receptors as construction occurs, as well as the duration of TAC exposure.

Page 4.3-28 of the Draft EIR is revised as follows:

Net SAP Area

Construction of land uses under the net SAP could begin as early as 2021 and last approximately 80 years. The emission estimates presented in Table 4.3-5 assume construction would take place at a consistent pace over an 80-year period. Ultimately, however, construction phasing would be driven by market conditions in any given year. Thus, the level of construction activity and associated emissions would likely be higher some years than in others. As construction continues in the future, equipment exhaust emission rates would decrease as newer, more emission-efficient construction equipment replaces older, less efficient equipment. For specific assumptions and modeling inputs, refer to Appendix K.

Table 4.3-5 summarizes the modeled maximum daily emissions from the construction activities for the net SAP area in 10-year increments. The table shows how emissions are expected to decrease as the fleet of older construction equipment is replaced by a newer, more emission-efficient fleet. However, emission reductions are only known through the year 2050, as the effect of existing regulation extends until that time. Thus, emission modeling ends at 2050 for the purposes of this analysis, even though buildout of the net SAP is expected to extend beyond 2050.

As shown in Table 4.3-5, if construction were to occur at a consistent pace during an 80-year buildout period, maximum daily emissions of ROG, NO_X, or PM_{10} would not exceed applicable thresholds through the anticipated buildout period. However, the amount of new construction that would occur under the net SAP would vary from year to year based on market conditions. There could be no new construction during some years and a boom in construction during other years. During boom periods, the level of construction activity could generate daily emission levels of ROG and NO_X substantially higher than the levels show in Table 4.3-5 that exceed PCAPCD's threshold of 82 lb/day. For instance, if six times the average rate of construction took place during the same period, then associated emissions of ROG would exceed PCAPCD's threshold of 82 lb/day. Similarly, if two times the average rate of construction took place during the same period, then associated emissions of NO_X could exceed PCAPCD's threshold of 82 lb/day. Moreover, the mass emission threshold for PM_{10} would be exceeded if five times the average rate of construction took place during the same period. Thus, there may be periods during the buildout of the net SAP area when construction-related emissions of ozone precursors, ROG and NO_X, as well as emissions of PM_{10} would exceed PCAPCD's recommended thresholds and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone, PM_{10}, and $PM_{2.5}$.

The addition of NO_X, which is a precursor to ozone, could result in an increase in ambient concentrations of ozone in the air basin and, moreover, increase the likelihood that ambient concentrations exceed the CAAQS and NAAQS. As summarized in "Environmental Setting," above, human exposure to ozone may cause acute and chronic health impacts including coughing, pulmonary distress, lung inflammation, shortness of breath, and permanent lung impairment. Also, the increase in construction-generated emissions of PM_{10} could impede air quality planning efforts to bring the air basin into attainment of the CAAQS for PM_{10}. However, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with development within the net SAP area to specific health outcomes to sensitive receptors. While the description of effects noted above could manifest in exposed receptors, actual effects on individuals depend on individual factors, such as life stage (e.g., infants, adolescents, and the elderly are more sensitive), preexisting cardiovascular or respiratory diseases, lifestyle choices, and genetic polymorphisms. Even if this type of specific medical information, which is confidential to the individual, were available, there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects described above. Therefore, other than determining the general types of health effects that could occur, it would be speculative to more specifically correlate exposure to criteria pollutants and precursors from this project to the degree and locations of specific health outcomes to receptors. By evaluating emissions of air pollutants against PCAPCD's thresholds, it is foreseeable that health complications associated with ozone and PM_{10} exposure could be exacerbated to nearby sensitive receptors by construction-generated emissions. Because construction-generated emissions would exceed PCAPCD's mass emissions thresholds, the project would contribute a substantial level of emissions that could impede PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Page 4.3-30 of the Draft EIR is revised as follows:

As shown in Table 4.3-5, maximum daily emissions of ROG, NO_X, and PM_{10} could potentially exceed applicable thresholds during various years of the estimated 18-year buildout period. Based on the assumptions used in the modeling maximum daily emissions of ROG, NO_X, and PM_{10} could be as

high as 131 lb/day, 280 lb/day, and 138 lb/day, respectively. Thus, there would be periods during the buildout of the SAP area when construction-related emissions of ozone precursors, ROG and NO_X, as well as emissions of PM_{10} would exceed PCAPCD's recommended thresholds and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone, PM_{10}, and $PM_{2.5}$. For the same reasons described above under "Net SAP Area," this exceedance would contribute a substantial level of emissions that could impede PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Other Supporting Infrastructure

Pleasant Grove Retention Facility

Construction of the South Basin of the Pleasant Grove Retention Facility was assumed to begin in 2021 and conservatively estimated to be complete in 5 years. Construction of the 10-acre North Basin of the Pleasant Grove Retention Facility was assumed to begin in 2026 and also estimated to take 5 years. Construction of both retention basins would involve the excavation and movement of 1,251,900 cubic yards of earthen material from 93 acres of the basin area to 154 acres of upland area on the site. This would be a more intense level of earth movement and associated heavy-duty, off-road equipment than the grading phases of land uses developed under the project. For specific assumptions and modeling inputs, refer to Appendix K.

As shown in Table 4.3-5, maximum daily emissions of ROG and PM_{10} would not exceed applicable thresholds during the construction of the Pleasant Grove Retention Facility. However, NO_X emissions generated during construction of these facilities would exceed the PCAPCD-recommended threshold. Based on the assumptions used in the modeling maximum daily emissions of NO_X could be as high as 184 lb/day, and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone. For the same reasons described above under "Net SAP Area," this exceedance would contribute a substantial level of emissions that could impeded PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Off-Site Transportation and Utility Improvements

It was assumed that construction of off-site transportation and utility improvements would begin in 2021 and each improvement would be completed in approximately 6 months; except the bridge connection on Foothills Boulevard South, which would be completed in 12 months. Reported emissions represent a conservative estimate of maximum daily emissions because all improvements were expected to be constructed simultaneously. However, actual construction phasing of off-site improvements is unknown at this time. For specific assumptions and modeling inputs, refer to Appendix K.

As shown in Table 4.3-5, maximum daily emissions of ROG and PM_{10} would not exceed applicable thresholds throughout the buildout period. However, NO_X emissions associated with construction of the bridge connection on Foothills Boulevard South would exceed the PCAPCD-recommended threshold of 82 lb/day. Based on the assumptions used in the modeling maximum daily emissions of NO_X could be as high as 159 lb/day and thereby contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and NAAQS for ozone. For the same reasons described above under "Net SAP Area," this exceedance would contribute a substantial level of emissions that could impeded PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be significant.

Conclusion

Construction emissions associated with the net SAP, PRSP, Pleasant Grove Retention Facility, and the off-site transportation and utility improvements would exceed applicable thresholds for ROG, NO_X, and PM_{10}, and thus contribute to the existing nonattainment status of the SVAB with respect to the CAAQS and/or NAAQS for ozone, PM_{10}, and $PM_{2.5}$. For the same reasons described above under

"Net SAP Area," this exceedance would contribute a substantial level of emissions that could impede PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be **significant**.

Page 4.3-33 of the Draft EIR is revised as follows:

In summary, because of the scale and extent of construction activities that would occur, as well as the uncertainty of specific construction activities and timing, construction activities could overlap, resulting in emissions that exceed PCAPCD's daily construction thresholds and contribute further to the nonattainment status of the SVAB and potential adverse human health effects to receptors exposed to such concentrations. This impact would remain **significant and unavoidable.**

Page 4.3-35 of the Draft EIR is revised as follows:

Net SAP Area

Table 4.3-7 summarizes the maximum daily operation-related emissions of criteria air pollutants and precursors at full buildout of the net SAP area. As shown in Table 4.3-7, operational activities would result in project-generated emissions of ROG, NO_X, and PM_{10} that exceed the PCAPCD-recommended thresholds of significance. For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impede PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This would be a significant impact.

Page 4.3-36 of the Draft EIR is revised as follows:

PRSP Area

Table 4.3-8 summarizes the maximum daily operation-related emissions of criteria air pollutants and precursors at full buildout of the PRSP area. As shown in Table 4.3-8, operational activities would result in project-generated emissions of ROG, NO_X, and PM_{10} that exceed the PCAPCD-recommended thresholds of significance. For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impeded PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This would be a significant impact.

Page 4.3-36 of the Draft EIR is revised as follows:

Conclusion

As shown in Tables 4.3-7 and 4.3-8 above, NO_X, PM_{10}, and $PM_{2.5}$ emissions associated with the operation of land uses developed under the project would exceed applicable mass emission thresholds recommended by PCAPCD. For this reason, these emissions could contribute substantially to the nonattainment status of SVAB with respect to the NAAQS and CAAQS for ozone, CAAQS for PM_{10}, and NAAQS for $PM_{2.5}$. (This would be the case even though no direct emissions would be associated with operation of the Pleasant Grove Retention Facility and the off-site transportation and utility improvements.) For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impede PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. This impact would be **significant**.

Page 4.3-41 of the Draft EIR is revised as follows:

Nonetheless, the operational emissions of some projects developed under the net SAP and PRSP would not individually generate emissions of ROG and/or NO_X that exceed PCAPCD's operational threshold of 55 lb/day but, as shown in this analysis, the combined level of operational emissions of ROG and/or NO_X associated with multiple developments would exceed PCAPCD's threshold. Because participation in a verified PM_{10} offset program cannot be assured, operational emissions of some

projects developed under the net SAP and PRSP could exceed the PCAPCD threshold of significance. For the same reasons described above under Impact 4.3-2, this exceedance would contribute a substantial level of emissions that could impeded PCAPCD's capacity to attain the NAAQS and CAAQS, which could result in adverse human health effects to receptors exposed to such concentrations. No additional feasible mitigation measures are available to reduce this impact, and this impact would be **significant and unavoidable.**

REVISIONS RELATED TO LANDFILL AND ODORS

In response to comments received by the Western Placer Waste Management Authority (WPWMA) and others, the County has revised the Draft EIR to include mitigation that identifies and prioritizes the odor improvement measures identified by WPWMA, many of which are also described in the Draft EIR and in comment letters. The Draft EIR has also been revised to explain that although a fee program does not currently exist to implement the WPWMA-proposed odor-reducing actions identified in Mitigation Measure 4.3-6a, WPWMA has created the foundation of such a program, and can and should apply a reasonable methodology to apportion costs for capital investments and ongoing operation and maintenance to create a bona fide fee program. In advance of such a program, the County is requiring the PRSP project proponents to make a monetary contribution, based on a reasonable, fact-based method, to WPWMA to reduce odor impacts and, upon development of a fee program by WPWMA, will require other proponents of projects within the net SAP area to contribute in accordance with established methodologies. See Master Response 4: Odors in Chapter 3, "Responses to Comments on the Draft EIR," for further details.

The discussion titled, "Mitigation Measures," on pages 4.3-51 through 4.3-52 of the Draft EIR is revised as follows:

Mitigation Measures

Reducing the 1-mile buffer around WRSL to accommodate development is an element of the proposed project. One approach to mitigation, as stated in the State CEQA Guidelines Section 15370, is to avoid the impact altogether by not taking a certain action or parts of an action. Placer County acknowledges that maintaining the 1-mile buffer, which would be a feature of the no-project alternative (see Chapter 6, "Project Alternatives") would reduce impacts by reducing the exposure of people to objectionable odors. However, after careful consideration, Placer County has determined that this measure would prevent the County from achieving its project objectives to provide for diversity of development in the project area (including postsecondary education facilities and employment-generating uses and associated residential development), provide a diversity of housing types, create a balanced mix of land uses, establish a site for a CSU, meet the County's regional housing needs allocation, ensure economic viability, and achieve consistency with the Sacramento Region Blueprint.

~~Another common approach to mitigating regional issues involves establishment of a regional mitigation fee program whereby fees are collected on a pro-rata basis from program beneficiaries and then spent on meaningful improvements that specifically reduce the impact in question. Placer County considered the merits of such a program to address odor impacts of the project but determined that establishment of a mitigation fee program would be infeasible. To establish such a program, performance standards would need to be developed to determine program objectives; specific improvements that would achieve the standards would need to be identified; cost estimates for construction, operation, and maintenance of those improvements would need to be developed; the type and geographic scope of fee program participants would need to be established; the pro-rata share per given development unit would need to be defined; and administrative processes and procedures would need to be crafted. Because there is no program currently in place; odor impacts are subjective, highly variable, and weather dependent; and because odor management and abatement are the responsibility of WPWMA, this mitigation approach would be infeasible.~~

While direct mitigation for odor issues would be beyond the control of Placer County, feasible measures are available to WPWMA, which owns and operates WRSL and MRF, including composting operations. WPWMA is already engaged in assessment, research, and pilot studies designed to minimize odors to the degree feasible. The following ~~are examples of~~ mitigation measure~~s either have been, or~~ can and should be~~,~~ adopted by WPWMA (CEQA Statute Section 21081; State CEQA Guidelines Section 15091):

Mitigation Measure 4.3-6a: Implement odor-reducing measures at the Western Regional Sanitary Landfill

WPWMA developed a slate of odor reduction measures it estimates will reduce WRSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058, the projected year of landfill closure and conservative estimate of project buildout. Measures apply to composting operations, landfill operations, and site-wide technologies and operations. Capital costs and costs for ongoing operation and maintenance of the measures were also estimated. (See Technical Report #2, prepared by CE Schmidt and TR Card, dated August 2, 2019, and correspondence from Robin R. Baral, Churchwell White, LLP, on behalf of the Authority, to Clayton Cook, Placer County Counsel, dated August 22, 2019.)

These measures, while not expressly proposed by WPWMA as the basis of a regional mitigation fee program, could logically serve that function. To develop a program, the Authority can and should take the additional steps to determine the type and geographic scope of fee program participants, the pro-rata share per given unit of development, and processes and procedures to administer the program. Based on information provided by WPWMA, the specific odor-reducing measures to be implemented under the program could include:

- **Implement Aerated Static Pile (ASP) Technology and Compost Best Management Practices (Tier 1, Composting Operations)**. To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology consisting of aerated static pile (ASP) technology in which air flow is induced through the material without turning or mixing. According to WPWMA, implementation of this measure is already planned for implementation. To ensure optimal odor reduction, best management practices (BMPs, e.g., anaerobic digestion of food waste) and training are also needed.

- **Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations)**. To ensure maximum composting odor reduction, odor emissions testing is required on an annual basis to monitor odors and implement appropriate response is target reductions are not being achieved.

- **Construct and Operate a Mixing Building with Biofilter (Tier 1, Composting Operations)**. To reduce odors associated with food waste composting, a mixing building fitted with a biofilter for air scrubbing should be constructed. The building would be a relatively small structure within which food waste would be received, blended with shredded green waste, then transferred to the ASP system where it would undergo controlled composting.

- **Apply Odor Neutralizers to Sorted Refuse (Tier 1, Landfill Operations)**. To reduce landfill-related odor emissions, odor neutralizers should be applied to sorted refuse between transfer from the materials recovery facility (MRF) to the landfill site. This measure involves initial implementation of a spray system and ongoing application of neutralizer.

- **Apply Odor Neutralizers to Active Landfill Face and Implement BMPs (Tier 1, Landfill Operations)**. To reduce landfill-related odor emissions, odor neutralizers should be applied to the active landfill face. Like that for sorted refuse, this measure involves initial implementation of a spray system and ongoing application of neutralizer. BMPs, such as limiting the size of the active landfill face, would optimize odor neutralizer operations.

- Increase Screening of Landfill Gas and Implement Response Actions (Tier 1, Landfill Operations). Quarterly screening for fugitive landfill gas should be conducted to identify "hot spots" of landfill gas emissions through interim and final landfill covers. Such screening would reduce the time between identification and repair of surface hot spot emissions, and thus odor.

- Enhance Landfill Gas Collection (Tier 1, Landfill Operations). To reduce landfill-related odor emissions, WPWMA should establish stricter protocols for landfill gas collection. Because landfill gas must be used, flared, or stored in a leak-free container, minimizing odorous emissions would involve operating the system for maximum containment of gas rather than maximum cost-effective performance of the gas-to-energy system.

- Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies and Operations). To monitor odor emissions in areas around the WRSL, odor sensors should be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the Authority's dispersion modeling capabilities should also be implemented to better predict the nature, location, and intensity of odor issues.

- Establish Odor Hotline and Implement Community Outreach (Tier 1, Site-wide Technologies and Operations). An odor hotline should be established to allow the public ready access to WPWMA staff who will receive community complaints and concerns, and to provide timely response actions.

- Establish Tree-lined Perimeter of WRSL (Tier 1, Site-wide Technologies and Operations). Trees with aromatic foliage, such as pine or eucalyptus, should be planted around WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility.

- Implement Compost Curing Controls (Tier 2, Composting Operations). To further reduce compost-related odor emissions, ASP techniques, described above for raw compost, can and should be used on cured compost.

- Improve Pond Aeration (Tier 2, Composting Operations). Leachate collected from composting activities is rich in organic compounds and therefore odorous, especially in anaerobic conditions. To further reduce odor emissions from the ponds, leachate should be aerated to increase aerobic digestion of organic compounds and reduce fugitive odors.

- Implement Monthly Odor Testing and Response Actions (Tier 2, Composting Operations). Monthly odor testing should be implemented to ensure odor reduction measures for active and cured compost are functioning as expected and to implement corrective actions as needed.

- Apply Posi-Shell Landfill Cover (Tier 2, Landfill Operations). Posi-Shell is an enhanced form of landfill cover that uses a blend of clay, fibers, and polymers to produce a spray-applied mortar that dries in the form of a thin durable stucco. Posi-Shell, or similar membrane cover, should be applied to reduce landfill-related odor emissions.

- Implement Continuous Cover on Active Landfill Face (Tier 2, Landfill Operations). Odor-neutralizing foam or similar product should be used on the active landfill face during fill operations to reduce landfill-related odor emissions.

- Conduct Additional Landfill Gas Monitoring and Implement Response Actions (Tier 2, Landfill Operations). Additional monitoring should be conducted to ensure that landfill gas leaks and emissions are not occurring in the above-ground system during gas collection and response actions implemented to correct such leaks if they are discovered.

- ~~**Implement Revised Composting Methodology.** To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology, consisting of either aerated static pile (ASP) technology; covered (CASP) technology, in which ASPs are covered with an organic or synthetic cover; and/or partial or total enclosure of the composting operation. If CASP technology is employed, VOC emissions could be reduced by approximately 72 percent, substantially reducing objectionable odors (SCS Engineers 2018:18).~~

- ~~**Minimize Use of Fines as Alternative Daily Cover.** Use of fines derived from municipal solid waste (MSW) and the materials recovery facility (MRF) as alternative daily cover (ADC) can generate more objectionable odors than the MSW waste stream because of its large surface area and potential to generate odorous gases. To reduce odors associated with composting operations, WPWMA can and should minimize use of fines as ADC to the degree feasible, and should cover MRF and MSW fines with MSW, soil, or other daily cover to reduce odor emissions from fines used overnight as ADC.~~

- ~~**Immediately Cover or Bury Sludge Waste.** To reduce odors associated with sludge received by WRSL from the Roseville Wastewater Treatment Plant (WWTP), WPWMA can and should immediately cover or bury sludge waste. This practice can prevent sludge from off gassing for extended periods and reduce odorous emissions that may migrate offsite.~~

The following mitigation measure is within the authority of Placer County and shall be implemented:

Mitigation Measure 4.3-6b: Require fair-share contribution to WPWMA for odor mitigation

As described in the Draft EIR at pages 4.3-6 through 4.3-11, objectionable odors are currently generated at WPWMA facilities, odor complaints are regularly lodged, and odors are an existing issue. It would be neither feasible nor reasonable for all odor mitigation costs to be borne by the proposed project. Therefore, based on the Authority-proposed measures, their costs, and a reasonable methodology to determine a fair-share contribution, Placer County shall require the proponents of the Placer Ranch Specific Plan to contribute a total payment of $2,465,273 to the Western Placer Waste Management Authority for purposes of funding odor reduction measures that will reduce odor impacts resulting from development within the Placer Ranch Specific Plan area.

The payment required of Placer Ranch Specific Plan proponents is based on: (1) the cost of non-Authority-funded Tier 1 odor control measures, apportioned by the number of residential units that could be developed in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary, and (2) a fair-share proportion of annual maintenance costs converted to present value over a 30-year absorption period, also apportioned by non-university residential units. Because odors are an existing issue, and because the entire project (PRSP and net SAP) would conservatively generate approximately 16 percent of odorous emissions compared to baseline conditions and 8 percent of odorous emissions in 2058 (estimated year of landfill closure and conservative estimate of project buildout), the proposed contribution for both capital expenditures and maintenance costs is considered conservative, that is, it more than compensates for the impact of the project. Costs include $2,172,513 in capital investment, plus approximately $290,000 for a one-time, good-faith contribution to operation and maintenance costs of the measures over a 20-year period. (The details and assumptions involved in the calculation of capital funding are described in greater detail in Master Response 4: Odors of the Final EIR.)

In addition to the fair-share contribution for odor mitigation required of PRSP, Placer County will require fair-share contribution by other future residential developments proposed in the net SAP area in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. Based on the Authority's comprehensive assessment of odor control measures, their efficacy, and costs, it is expected that WPWMA can and should develop a bona fide regional fee program to which

proponents of regional development projects will contribute to implement, operate, and maintain odor control measures.

Significance after Mitigation

As noted above, WPWMA is engaged with the community regarding odor management, is assessing the viability of odor-reducing approaches through pilot studies and is actively planning facility and operational improvements as part of its Renewable Placer Waste Action Plan to address regional growth, regulatory requirements, and other goals and objectives, including odor control. WPWMA's identified odor reduction actions (Mitigation Measure 4.3-6a) are estimated to reduce WRSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058. However, the State CEQA Guidelines state that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments" (Section 15126.4[a][2]). Because direct implementation of the actions listed in Mitigation Measure 4.3-6a are beyond the jurisdiction of Placer County, they are infeasible for the County to implement. Fair-share contribution to such measures is the County's responsibility to enforce, however, and Mitigation Measure 4.3-6b would require a monetary contribution by Placer Ranch Specific Plan proponents and by future net SAP area developments to WPWMA for their odor impacts, and participation by other projects, as applicable, in a regional mitigation fee program that can and should be developed by WPWMA for additional odor control measures and ongoing operation and maintenance. However, because ~~these specific measures are~~ full implementation of the odor control measures proposed by WPWMA is beyond the jurisdiction of Placer County, and because the nature, degree, and effectiveness of ~~future~~ odor control measures that may ultimately be implemented by WPWMA are unknown, odor impacts resulting from the project would be **significant and unavoidable**.

OTHER REVISIONS

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4.3-22 of the Draft EIR is revised as follows:

> Although the actual construction schedule is unknown, construction of the project area, South Basin of the Pleasant Grove Retention Facility, and off-site transportation and utility improvements were assumed to begin as early as 2021. Construction of the North Basin of the Pleasant Grove Retention Facility was assumed to begin as early as 2026. Actual construction may begin later than assumed; therefore, this assumption is conservative because emissions generated by construction are expected to decrease in the future with increased emission controls and standards. Construction of the land uses under the SAP is anticipated to last 80 years, and this analysis assumes the pace of construction will be consistent during this 80-year period. While buildout of the plan is anticipated to be 20 years, construction under the PRSP is anticipated to last 18 years and would be driven by market demand. Buildout of the Sac State–Placer Center could take longer than buildout of the rest of the PRSP area.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The first paragraph on page 4.3-27 of the Draft EIR is revised as follows:

PRSP Area

Development under the PRSP was considered in the MTP/SCS 2036 at an intensity greater than what is analyzed in this EIR. The MTP/SCS 2036 assumed that the land use development under the PRSP would support 6,740 housing units and 20,155 jobs (SACOG 2016:25 in Appendix E-3) whereas the PRSP area is planned to support ~~5,827~~5,636 housing units and 16,488 jobs. Because the level of development assumed was more intensive in the MTP/SCS, development under the PRSP would be consistent with the MTP/SCS 2036 and, in turn, consistent with all applicable air quality plans. Consistent with the conclusion identified for the SAP, above, this impact would be less than significant.

To correct a typographical error, the second bullet of Mitigation Measure 4.3-2a on page 4.3-31 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-2a: Implement PCAPCD's recommended construction mitigation measures (Net SAP Area and PRSP Area)

...

- The contractor shall submit to the PCAPCD a comprehensive equipment inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower ~~of~~ or greater) that will be used in aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the contractor shall contact the PCAPCD before the new equipment being utilized. At least three business days before the use of subject heavy-duty off-road equipment, the project representative shall provide the PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and on-site foreman.

To correct a typographical error, the first bullet of Mitigation Measure 4.3-3c on page 4.3-39 of the Draft EIR is revised as follows:

Mitigation Measure 4.3-3c: Purchase ROG and NO_X offsets through PCAPCD's Off-Site Mitigation Fee Program (Net SAP Area and PRSP Area)

...

- Establish mitigation off-site within the west Placer County by participating in an off-site mitigation program, coordinated by PCAPCD. Examples include, but are not limited to: participation in a ~~b~~ biomass program that provides emissions benefits; retrofitting, repowering, or replacing heavy-duty engines from mobile sources (e.g., buses, construction equipment, on road haulers); or other programs to reduce emissions.

The County has revised Mitigation Measure 4.3-5a on page 4.3-46 of the Draft EIR, as follows, to address currently planned industrial expansions in the net SAP area and to provide specific measures for residential development that may be proposed near existing/planned industrial development:

Mitigation Measure 4.3-5a: Incorporation of design features ~~at truck loading areas~~ to reduce health-risk exposure at sensitive receptors (Net SAP Area and PRSP Area)

~~Before Design Review approval~~ Prior to Design Review approval and/or issuance of grading permit, ~~project proponents shall design developments~~ new development shall be designed so that truck loading/unloading facilities ~~and sensitive receptors~~ are not located within 1,000 feet of ~~each other~~ existing or planned sensitive receptors, if feasible considering site design parameters. Existing or previously approved industrial/commercial development, including any development within boundaries of existing industrial parks, are not subject to this mitigation measure. For the purpose of this mitigation measure, a truck loading/unloading facility is defined as any truck distribution yard, truck loading dock, or truck loading or unloading area where more than one truck with three or more axles will be present for more than 10 minutes per week, on average; and sensitive receptors include residential land uses, campus dormitories and student housing, residential care facilities, hospitals, schools, parks, playgrounds, or daycare facilities. A truck loading/unloading facility ~~and a sensitive receptor~~ can be located within 1,000 feet of ~~each other~~ a sensitive receptor only if ~~a project proponent~~ the project applicant prepares a qualified, site-specific HRA showing that the associated level of cancer risk at the sensitive receptors would not exceed 10 in 1 million. The HRA shall be conducted in accordance with guidance from PCAPCD and shall be approved by PCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. Design measures may include but are not limited to the following:

- Implement Mitigation Measure 4.3-3a, which requires all truck loading/unloading facilities to be equipped with one 110/208-volt power outlet for every two-truck loading/unloading facility. A minimum 2-foot-by-3-foot sign shall be clearly visible at each loading dock that indicates, "Diesel engine idling limited to a maximum of 5 minutes." The sign shall include instructions for diesel trucks idling for more than 5 minutes to connect to the 110/208-volt power to run any auxiliary equipment. This measure is recommended in PCAPCD's *CEQA Handbook* (PCAPCD 2017a) and is also consistent with measure VT-1 in the CAPCOA guide (CAPCOA 2010:300–303).

- The use of electric-powered "yard trucks" or fork lifts to move truck trailers around a truck yard or truck loading/unloading facility.

- The use of buildings or walls to shield commercial activity from nearby residences or other sensitive land uses.

- The use of EPA-rated Tier 4 Final engines in diesel-fueled construction equipment when construction activities are adjacent to existing sensitive receptors.

- Plant and maintain a vegetative buffer between the truck loading/unloading facility and nearby sensitive residences, schools, and daycare facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

Applicants of residential or commercial development with new sensitive receptors proposed to be located within 1,000 feet of existing and/or planned commercial/industrial facilities that include, or may include, truck loading/unloading facilities, shall prepare an HRA as described above. Design measures identified in the HRA may include but are not limited to the following:

- Redesign the project to increase the distance between sensitive receptors and potential truck loading/unloading facilities;

- Use of upgraded filtration systems in the residential HVAC systems;

- Use of intervening buildings or walls to shield the receptors from the truck loading/unloading facility;

- Plant and maintain a vegetative buffer between sensitive receptors and the truck loading/unloading facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement. To reflect this change, the third full paragraph on page 4.3-49 of the Draft EIR is revised as follows:

Existing and Post-Project Landfill Odor

As described above, there are several existing odor sources in and near the project area, including the WRSL operations. An amendment of County General Plan Policy 4.G.11 is proposed to permit a reduction in the 1-mile (5,280-foot) buffer for residential uses to 2,000 feet with approval of a specific plan, master plan, or development agreement. ~~While the PRSP proposes residential uses 2,000 feet from the landfill property line, the amended General Plan Policy 4.G.11 would allow for future specific plans to propose, residential uses to be developed as close as 1,000 feet from the~~

~~landfill property line.~~ In addition, while residential use is not a central feature of proposed land uses in the net SAP area, housing may be incorporated as a subordinate use into net SAP area projects in the, Innovation Center, Entertainment Mixed-Use, and Light Industrial land use designations. This provision would allow people to live and work in the same region, shorten commute times, and reduce vehicle miles traveled, but could put additional residential uses in closer proximity to the landfill, substantially increasing the exposure of people to objectionable odors.

2.1.8 Revisions to Section 4.4, "Biological Resources"

In response to public comment, the County has added Policy NR-4.5 to the SAP to further protect adjacent wetlands. To that end, the bulleted list of SAP policies on page 4.4-32 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- Policy NR-4.5: Construction Management Adjacent to Open Space. To protect biological resources in designated Open Space areas, either within or adjacent to the Sunset Area, the County shall require development activities to limit disturbance during construction to the minimum area necessary for construction and access and will prohibit fill within any preserved waters of the U.S. and habitat for Endangered Species unless permitted by the Agencies. To ensure this protection, the County will require that the following protective measures be taken prior to or during project construction:

  A. Improvement plans that show the boundaries and label the Open Space areas

  B. For projects adjacent to the City of Roseville's Open Space preserve areas, the County shall coordinate with the City of Roseville to ensure protection of preserve areas consistent with the City's Open Space Preserve Overarching Management Plan

  C. Pre-construction meetings for construction occurring adjacent to (within 250 feet) or within Open Space areas to address the presence of the Open Space, the sensitive habitats present, minimization of disturbance to the Open Space, and the requirements for preservation of habitat

  D. Biological monitor to observe construction activities occurring within 250 feet of adjacent Open Space Preserve unless there is clearly not foreseeable impact to Open Space habitats

  E. Permits as needed from the Corps, Service, and the County prior to initiation of grading within the open space areas

  F. Temporary construction fencing will be required prior construction adjacent to or within any Open Space area

  G. Flagging of preserved wetlands adjacent to construction within the Open Space

  H. Stormwater pollution prevention BMPs and a Stormwater Pollution Prevention Plan (SWPPP) to prevent pollutant discharges into the Open Space for any project over one acre in size to control sediment and erosion during construction.

  I. Temporary stormwater discharge measures (e.g., discharge points, swales) to properly direct flows and ensure that erosion does not take place at any location along the swale or at the point of discharge to avoid discharge into vernal pools and inundation of oak trees.

  J. Use of native grasses in post construction revegetation

K. Trash removal and post construction clean-up

L. Post-construction remediation construction impacts as needed

In response to comment 16-5 and to clarify that the mitigation measure is intended to relocate turtles to equal- or better-quality habitat than the affected habitat and protect eggs and hatchlings as well as adult turtles, Mitigation Measure 4.4-5a on page 4.4-59 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-5a: Minimize and avoid disturbances to western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird; compensate for loss of occupied habitats (Net SAP Area and PRSP Area)

Western Pond Turtle

Before ground disturbing activities, project proponents shall retain a qualified biologist to determine whether the potential project site contains suitable habitat for western pond turtle. For projects or ground-disturbing activities (including any required off-site improvements) with potential to disturb suitable aquatic or adjacent upland habitat for western pond turtle, the following measures shall be implemented.

- Within 24 hours before beginning construction activities within ~~200~~ 300 feet of suitable aquatic habitat for western pond turtle, a qualified biologist shall survey areas of anticipated disturbance for the presence of western pond turtle, including eggs and hatchlings. The construction area shall be re-inspected whenever a lapse in construction activity of two weeks or more has occurred. If pond turtles or their eggs are found during the survey or observed within the construction area at any other time, they shall be relocated by a qualified biologist, outside of the area of disturbance, to the nearest area ~~with~~ of suitable aquatic habitat of equal or better quality as the affected habitat. ~~and~~ CDFW will be notified of the discovery and relocation of any western pond turtles.

- If western pond turtle nests are found in the disturbance area during preconstruction surveys, a 300-foot no disturbance buffer shall be established between the nest and any areas of potential disturbance. Buffers shall be clearly marked with temporary fencing. Construction will not be allowed to commence in the exclusion area until hatchlings have emerged from the nest, or the nest is deemed inactive by a qualified biologist. When hatchlings emerge from the nest, they shall be relocated by a qualified biologist to suitable aquatic habitat outside of the area of disturbance.

To correct a typographical error, the fourth bullet of Mitigation Measure 4.4-7a on page 4.4-67 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees (Net SAP Area and PRSP Area)

...

- The project proponent required to replace lost trees shall provide appropriate irrigation and maintenance to replacement trees and will enter into a maintenance agreement with the County. The project proponent shall post a deposit for the replacement cost of replanted trees to the County and the deposit shall be retained until the County arborist certifies that conditions of the tree permit have been satisfied.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.4-8c on page 4.4-70 of the Draft EIR is revised as follows:

Mitigation Measure 4.4-8c: Provide wildlife crossing structures (Net SAP Area and PRSP Area)

The County shall require road crossings over the stream system open space areas to be designed to provide safe wildlife movement using wildlife overpasses, underpasses, bridges, or culverts that are adequately sized to allow safe crossing even during high water. Design of crossings shall be based on movement requirements for the range of common and sensitive native wildlife species in the region. Where feasible and appropriate, fencing may be used to direct animals toward wildlife crossing structures and away from roadways. For the Sac State–Placer Center site, safe wildlife movement facilities shall be provided as applicable to the Sac State–Placer Center site.

2.1.9 Revisions to Section 4.5, "Archaeological, Historical, and Tribal Cultural Resources"

No revisions are needed.

2.1.10 Revisions to Section 4.6, "Geology and Soils"

No revisions are needed.

2.1.11 Revisions to Section 4.7, "Greenhouse Gas Emissions"

To provide a revision to SAP Policy NR-6.1, the first bullet on page 4.7-15 of the Draft EIR is revised as follows:

- **Policy NR-6.1: ~~mPOWER Incentive Program~~ Energy Conservation.** The County shall continue to support and implement ~~the mPOWER incentive program~~ energy efficiency and conservation strategies to reduce greenhouse gas emissions from buildings and other site improvements.

To provide a revision to SAP Policy NR-6.7, the seventh bullet on page 4.7-15 of the Draft EIR is revised as follows:

- **Policy NR-6.7: Residential Energy Efficiency.** The County shall require ~~encourage~~ new residential units to be designed and constructed to maximize energy efficiency. This ~~should~~ shall include ~~consideration of~~ the following design features:

  a) Installation of solar photovoltaic systems ~~Pre-plumbing and structural design to accommodate solar energy systems~~.

  b) Installation of energy conservation appliances such as tankless water heaters and whole house fans in all residential units.

  c) Installation of energy efficient AC units and heating system with programmable thermostat timers, to the extent feasible.

  d) Use of low flow water fixtures such as low flow toilets and faucets, to the extent feasible.

In response to comment 5-1, Table 4.7-2 on page 4.7-19 of the Draft EIR is revised as follows:

Table 4.7-2 Unmitigated Operational Greenhouse Gas Emissions for Net SAP Area and PRSP Area at Full Buildout

Emissions Activity	GHG Emissions ($MTCO_2e$/year)	
	Net SAP Area at Buildout	PRSP Area at Buildout
Hearths and landscape equipment	~~1,512~~ 934	7,797
Electricity consumption	35,107	17,700
Natural gas combustion	46,112	18,233
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,926	2,177
Total operational annual GHG emissions	**~~378,518~~ 377,940**	**201,004**
PCAPCD De Minimis Level	1,100	1,100
PCAPCD Bright-Line Threshold	10,000	10,000

Notes: Totals may not add because of rounding.; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.

Full buildout of the SAP area is expected to occur past 2050, the latest year for which mobile-source emission factors are provided by the EMFAC2014 model.

Source: Modeling conducted by Ascent Environmental in 2018.

To allow cogeneration as an option for reducing energy use, Mitigation Measure 4.7-2a on pages 4.7-20 to 4.7-21 of the Draft EIR is revised as follows:

Mitigation Measure 4.7-2a: Implement all feasible on-site features to reduce operational GHG emissions (Net SAP Area and PRSP Area)

The County will require project proponents of development proposed under the project to incorporate the following measures to reduce operational emissions of GHGs to the extent feasible.

...

Building Energy

Reduce GHG emissions associated with building energy through the following measures:

...

- Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Reductions can also be achieved by incorporation of co-generation facilities. Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.

In response to comment 5-2, the discrepancies in the amount of mitigated GHG emissions are addressed and Mitigation Measure 4.7-2b on pages 4.7-21 and 4.7-22 of the Draft EIR is revised as follows:

Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area)

The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. This

mitigation measure is consistent with guidance recommended by PCAPCD and CARB (PCAPCD 2017:54, CARB 2017:152). This measure is also consistent with the State CEQA Guidelines, which recommend several options for mitigating GHG emissions. State CEQA Guidelines Section 15126.4(C)(3) states that measures to mitigate the significant effects of GHG emissions may include "off-site measures, including offsets that are not otherwise required...."

Project proponents shall implement an off-site GHG emissions reduction program or to pay GHG offset fees to compensate for the project's emissions in excess of 1,100 $MTCO_2e$ for a single year, or as determined feasible by the County and project proponent. The off-site program shall comply with approved protocols from California Air Pollution Control Officers Association's (CAPCOA) GHG Rx program or CARB's Cap & Trade Offset protocols. Alternatively, the project proponent can purchase local or California-only GHG mitigation credits through the CAPCOA GHG Rx program or ARB accredited offset project registry. At the time this EIR was written, the average rate ranges from $8 to $35 per metric ton of CO_2e.

The net SAP area would generate ~~373,896~~ 367,900 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 366,800 MT CO_2e for a period of one year, or 49.13 $MTCO_2e$/year per thousand square feet of nonresidential development and 27.27 $MTCO_2e$/year for each residential unit in the net SAP area. ~~Based on the current average rate of $12 per metric ton of CO_2e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal $5,120,190 (equivalent to $0.66 per square foot for nonresidential and $954 per residential unit).~~

PRSP would generate ~~195,014~~ 195,990 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 $MTCO_2e$, or ~~27.14~~ 27.27 $MTCO_2e$/year for each residential unit in the PRSP area. ~~The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal $1,706,730 (equivalent to $955 per residential unit).~~ Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K.

This condition shall be satisfied prior to the recordation of each Small Lot Final Map or building permit issuance when a small lot map is not required.

PCAPCD and CARB also recommend that lead agencies prioritize direct investments in GHG emission reductions near the project site to provide potential local air quality and economic co-benefits. ~~For example, mPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting."~~

~~Other e~~Examples of local direct investments include financing installation of regional electric vehicle–charging stations, paying for electrification of public school buses, and investing in local urban forests. However, it is critical that any such investments in actions to reduce GHG emissions are real and quantifiable, as determined by the County, PCAPCD, or a consultant selected by the County.

Where development of a local offset is not feasible, the County will allow project proponents to mitigate GHG emissions through the purchase of ~~local or California only~~ carbon credits issued through the CAPCOA GHG Rx program or CARB-accredited offset project registry. The purchase of carbon credits shall be prioritized in the following manner: offsite within the SVAB portion of Placer County, within Placer County, or within California.

The GHG reductions achieved through an offset or through the purchase of a carbon credit must meet the following criteria:

- **Real**—They represent reductions actually achieved (not based on maximum permit levels).
- **Additional/surplus**—They are not already planned or required by regulation or policy (i.e., not double counted).
- **Quantifiable**—They are readily accounted for through process information and other reliable data.
- **Enforceable**—They are acquired through legally binding commitments/agreements.
- **Validated**—They are verified through the accurate means by a reliable third party.
- **Permanent**—They will remain as GHG reductions in perpetuity.

The project applicant can satisfy the requirements of this measure by purchasing sufficient carbon credits through the accredited carbon credit registries, investing in a local GHG reduction project/program which complies with the approved protocol from the CAPCOA GHG Rx program or CARB's Cap-and-Trade offset protocols, or paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the small lot final map or approval of the first building permit when a small lot map is not required. Demonstration of compliance shall be provided to the County and carbon offset purchases should be verified by a third party. If the mitigation fee is chosen, the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices for GHG allowances at the time of the small lot final map recordation or building permit issuance when a small lot map is not required.

~~Establishment of offsets or purchases of carbon credits to offset operational generated GHG emissions should be made prior to recordation of each small lot final map, or approval of the first building permit when a small lot map is not required.~~

In response to comment 5-1, Table 4.7-3 on page 4.7-23 of the Draft EIR is revised as follows:

Table 4.7-3 Mitigated Operation-Related Greenhouse Gas Emissions

Emissions Activity	GHG Emissions ($MTCO_2e$)	
	Net SAP Area	PRSP Area
Landscape equipment	~~934~~ 26	5,185
Electricity Consumption	~~32,840~~ 26,555	15,715
Natural gas combustion	~~44,914~~ 46,112	~~17,257~~ 18,233
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,346	1,760
PCAPCD De Minimis Level	1,100 $MTCO_2e$/year	1,100 $MTCO_2e$/year
PCAPCD Bright-Line Threshold	10,000 $MTCO_2e$/year	10,000 $MTCO_2e$/year
Total operational annual GHG emissions	~~373,895~~ 367,900	~~195,014~~ 195,990

Notes: Totals may not add because of rounding; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.

Source: Modeling conducted by Ascent Environmental in 2018

2.1.12 Revisions to Section 4.8, "Hazards and Hazardous Materials"

To correct a typographical error, Mitigation Measure 4.8-1a on pages 4.8-30 and 4.8-31 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-1a: Complete a Phase I ESA (Net SAP Area)

A Phase I ESA shall be completed by project proponents of individual projects in the net SAP area. The Phase I ESA shall be performed in general conformance with the scope and limitations of ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and EPA "Standards and Practices for All Appropriate Inquires," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the project proponent shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted. These recommendations shall be implemented, and the site shall be deemed remediated by the appropriate agency (DTSC, Placer County Department of Environmental Health Services [PCDEHS]) or Placer County shall issue a No Further Action letter before earth disturbance in the vicinity of the contamination.

To provide a minor clarification, Mitigation Measure 4.8-2 on page 4.8-36 of the Draft EIR is revised as follows:

Mitigation Measure 4.8-2: Implement measures specified in CCR Title 27 to minimize intrusion of landfill gas into structures (Net SAP Area and PRSP Area)

For any structure sited within 1,000 feet of the WRSL property boundary, the following measures specified in CCR Title 27 Section 21190(g) shall be included in the construction drawings ~~and/or blueprints~~ (as applicable) for review and approval by the County Health and Human Services Department:

2.1.13 Revisions to Section 4.9, "Hydrology and Water Quality"

In response to comment 4-45, the first full paragraph on page 4.9-28 of the Draft EIR is revised as follows:

The Pleasant Grove Retention Facility would function by diverting water from Pleasant Grove Creek and University Creek into adjacent retention basins during storm events. Stormwater would be retained in these basins until downstream flood events end, after which the stored water would be discharged into Pleasant Grove Creek (CES 2017a). The Lakeview Farms Retention Facility would accept stormwater runoff during high flows and allow infiltration in large, constructed wetlands. The Pleasant Grove Retention Facility is currently proposed as two large basins with a combined capacity of 3,461 acre-feet (CES 2017a). The Lakeview Farms Retention Basin would be a single large basin and would be expanded in phases. The first phase ~~(currently planned for construction in 2018),~~ (expected to begin construction in 2020) would hold 1,080 acre-feet of stormwater. The second phase would expand the facility to hold 2,800 acre-feet of stormwater, which would meet the projected needs of the City of Lincoln at buildout. The third and final phase could expand the facility to hold as much as 4,000 acre-feet of stormwater (CES 2017b). Both facilities would require expansion of their planned retention basins to accommodate future projected municipal flows and flows from the net SAP area. Technical studies prepared for the SAP found that both the Pleasant Grove and Lakeview Farms Retention Basins can be expanded to meet the stormwater retention needs of the SAP (CES 2017a, 2017b). Exhibit 3-23 shows the location of the potential regional stormwater retention facilities. Any changes to the Pleasant Grove or Lakeview Farms Retention Facility would occur only through the review and planning process of the appropriate jurisdictions (City of Roseville for the Pleasant Grove Retention Facility and the City of Lincoln for the Lakeview

Farms Retention Facility). (It should be noted that, as part of these review and planning processes, the retention facilities would all be designed and engineered according to applicable federal, state, and city standards, which would minimize potential for failure of a levee wall or other facility that could cause flooding of downstream properties.)

County staff initiated the following text change to provide clarification to Mitigation Measure 4.9-1b on page 4.9-32 of the Draft EIR.

Mitigation Measure 4.9-1b: Design, construct, and maintain regional stormwater retention and detention facilities or pay retention mitigation fees (Net SAP Area and PRSP Areas)

The improvement plan submittal and final drainage report shall ~~provide details on how to achieve the following requirements:~~ demonstrate, through the preparation of technical engineering studies, that the increased peak flow and volume of stormwater runoff from the proposed development can be accommodated on-site or in the approved City of Roseville Regional Stormwater Retention Facility and/or other off-site facility. The study shall:

1. Be submitted to the City of Roseville Public Works Department for review and concurrence if the net SAP or PRSP is proposing to utilize the City of Roseville Regional Stormwater Retention facility for stormwater retention;

2. Demonstrate, through the preparation of technical engineering studies, that s~~S~~tormwater run-off peak flows ~~shall be reduced to~~ obtain an objective post-project mitigated peak flow that is equal to the estimated pre-project peak flow, less 10 percent of the difference, through the installation of detention facilities; and,

~~2~~3. Demonstrate, through the preparation of technical engineering studies, that s~~S~~tormwater volumetric increases ~~shall be~~ are mitigated to retain the increase for the 100-year, 8-day design storm, depth of 10.75 inches at elevation of 200- feet, unless another methodology has been agreed upon by Placer County. The project proponent shall either provide permanent on-site retention or participate in a regional stormwater retention program, if established by the County, by paying retention mitigation fees including maintenance and operation costs, as deemed appropriate, to mitigate the project's increases to stormwater volume. If interim retention facilities are constructed within the PRSP and net SAP areas on parcels zoned for development, the development project would also be subject to payment of the retention fee, in order to fund construction of the ultimate regional retention facility.

Retention and detention facilities shall be designed in accordance with the requirements of the Placer County Storm Water Management Manual ~~and/or City of Roseville~~ standards that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division, and shall be shown in the improvement plans. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Mitigation Measure 4.9-5c on page 2-67 of the Draft EIR is revised as follows:

Mitigation Measure 4.9-5c: Prohibit grading within the 100-year floodplain (Net SAP Area and PRSP Area)

No grading activities of any kind may take place within the 100-year floodplain of the stream/drainageway unless approved and analyzed as part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). The location of the 100-year floodplain shall be shown on the Improvement Plans.

Prior to Improvement Plan approval and if required by the County Floodplain Administrator, the project proponent shall obtain from FEMA, a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area. A copy of the letter shall be provided to the Engineering and Surveying Division prior to approval of Improvement Plans. A Letter of Map Revision (LOMR), or a Letter of Map Revision based on Fill (LOMR-F) from FEMA shall be provided to the Engineering and Surveying Division prior to acceptance of project improvements as complete, or as otherwise approved for the Sac State–Placer Center site.

2.1.14 Revisions to Section 4.10, "Land Use"

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, the last paragraph on page 4.10-1 continuing to page 4.10-2 of the Draft EIR is revised as follows:

> The Placer County Environmental Checklist also requires assessment of conflict with "[p]lan policies adopted for the purpose of avoiding or mitigating an environmental effect." As described in detail in Chapter 3, "Project Description," the project proposes an amendment to General Plan Policy 4.G.11, the purpose of which is to protect landfill facilities from incompatible encroachment. The policy currently requires that "new residential land uses…be separated from the property lines of active and future landfill sites by a buffer of one mile," or 5,280 feet. The proposed policy would allow residential development as close as ~~1,000 feet to the Western Regional Sanitary Landfill (WRSL) with approval of a specific plan, master plan, or a development agreement with certain requirements. Without a specific plan or development agreement, the minimum buffer zone would be~~ 2,000 feet to the Western Regional Sanitary Landfill (WRSL) with approval of a specific plan, master plan, or development agreement. This policy change is addressed below in Impact 4.10-2, Consistency and compatibility with the WRSL; in Section 4.3, "Air Quality," Impact 4.3-6, Create objectionable odors affecting a substantial number of people; and in Section 4.15, "Utilities," Impact 4.15-11, Potential impact on WRSL from incompatible land use that results in insufficient permitted capacity to serve waste disposal needs.

In response to comment 31-8 and to provide a correction to the number of hotel rooms at Thunder Valley Casino Resort, the second full paragraph on page 4.10-3 of the Draft EIR is revised as follows:

> The plan area experienced some business expansions and new development activity since 1997. Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the most significant new development in the plan area since 1997, now with a ~~297~~408-room hotel, spa, concert venue, restaurants, and gaming facility. Additionally, some core industrial uses have been developed in the southeastern portion of the plan area.

To reflect the new mitigation measures added in Section 4.3, "Air Quality," to reduce objectionable odors, the first paragraph on page 4.10-18 of the Draft EIR is revised as follows:

> ### Mitigation Measures
> As described in detail in Section 4.3, "Air Quality," Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are available to mitigate odor impacts. Mitigation Measure 4.3-6a outlines measures proposed by WPWMA that should be implemented at the WRSL to reduce odors. Odor reduction measures include those pertaining to composting operations (e.g., ASP technology, odor emissions testing and response, mixing building with biofilter scrubbing), landfill operations (e.g., odor neutralizers, increased landfill gas screening and collection), and site-wide technologies and

operations (e.g., enhanced monitoring and modeling, community outreach, and tree-lined perimeter). Mitigation Measure 4.3-6b would require a monetary contribution by the proponents of Placer Ranch Specific Plan to WPWMA for odor mitigation, and participation by future developers within the net SAP area who propose residential projects in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. The County will also consider participation by future projects in a regional odor mitigation fee program that can and should be developed by WPWMA. ~~measures available to Placer County to mitigate odor impacts (e.g., redesign of the proposed project, implementation of a regional mitigation fee program) would be infeasible, but feasible measures are available to WPWMA, which owns and operates WRSL and MRF, including composting operations. Such measures include revised composting methods, minimizing use of fines as alternative daily cover, and appropriate and timely handling of sludge waste (see Mitigation Measures subsection of Impact 4.3 6, Create objectionable odors affecting a substantial number of people).~~

The County has revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, the impact summary and the paragraph immediately following on page 4.10-14 of the Draft EIR are revised as follows:

Impact 4.10-2: Consistency and compatibility with the Western Regional Sanitary Landfill

The proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the WRSL from 1 mile (5,280 feet) to 2,000 feet for residential development~~, or 1,000 feet~~ with the approval of a specific plan, master plan, or development agreement. This proposed General Plan amendment could result in land use incompatibility due to residential development occurring closer to the WRSL in areas that would otherwise remain undeveloped under the current residential buffer policy. Based on review of existing data regarding nuisance complaints from residents beyond 1 mile, it is expected that new residents and users within the project area would complain about odor from the WRSL and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. Impacts relative to consistency and compatibility of proposed land uses with the WRSL would be **potentially significant**.

Net SAP Area and PRSP Area

An amendment to County General Plan Policy 4.G.11 is proposed to permit a reduction in the 1-mile (5,280-foot) buffer zone to 2,000 feet for residential development ~~or to 1,000 feet~~ with approval of a specific plan, master plan, or development agreement. ~~While t~~The closest residential development proposed as part of the PRSP would be 2,000 feet from the landfill property line~~, the amended General Plan Policy 4.G.11 would allow future specific plans to propose residential development as close as 1,000 feet from the landfill property line~~. In addition, while residential development is not a central feature of proposed land uses in the net SAP area, housing may be incorporated as a subordinate use into SAP projects in the General Commercial, Innovation Center, Entertainment Mixed-Use, and Light Industrial land use designations. This provision would allow people to live and work in the same region, shorten commute times, and reduce vehicle miles traveled, but could put additional residential uses in closer proximity to the landfill.

To reflect the revision to proposed change to the General Plan landfill buffer policy described above, page 4.10-17 of the Draft EIR is revised as follows:

> Implementation of the proposed SAP, including the PRSP, would result in subsequent projects that could result in residential development within 2,000 feet of the landfill~~, or within 1,000 feet~~ if approved through a specific plan, master plan, or development agreement. While measures can be implemented in an attempt to minimize landfill odors, the odors cannot be completely eliminated. Regardless of the buffer distance established through policy, implementation of the project is likely to result in an increase in the number of odor complaints received by WPWMA and PCAPCD. Such complaints could lead to increased pressure for WPWMA to implement odor control and reduction measures at the WRSL. Impacts relative to consistency and compatibility of proposed land uses with the WRSL would be **potentially significant**.

To reflect the new mitigation measures added in Section 4.3, "Air Quality," to reduce objectionable odors, the last paragraph on page 4.10-18 of the Draft EIR is revised as follows:

> Significance after Mitigation
>
> Mitigation Measure 4.10-2 would require implementation of measures in new development pursuant to proposed specific plans, master plans, or development agreements that would reduce perception of odor inside new structures and, to a lesser extent, outside new structures. These measures would potentially aide in increasing land use compatibility in the PRSP. However, this measure would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are also available for reducing odors at the WRSL. However, Mitigation Measure 4.3-6a is infeasible for the County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown. Therefore, this impact would be **significant and unavoidable**.

2.1.15 Revisions to Section 4.11, "Noise"

In response to comment 4-50, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR is revised as follows:

> ### Mitigation Measure 4.11-4b: Reduce exposure to new sensitive land uses from the existing Roseville Power Plant 2 (PRSP Area)
>
> - Before approval of small-lot tentative maps, the project proponent shall demonstrate that the building occupants of new residential or other sensitive land use within the PRSP area are not exposed to noise levels from the RPP2 that exceed Placer County land use compatibility standards (e.g., 60 dBA L_{dn}/CNEL for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA L_{eq}/65 dBA L_{max} [night], 55 dBA L_{eq} /70 dBA L_{max} [day]).
>
> - If achievement of the Placer County noise standards cannot be met by providing adequate setback of at least 590 feet from the RPP2 (i.e., distance at which nighttime L_{eq} standard is met), then the County shall require the developer, at developer's expense, to construct a sound wall ~~be constructed~~ between the existing RPP2 and any new sensitive receptors. ~~The sound wall shall be designed by an acoustical engineer and constructed and placed in a manner that achieves, at a minimum, a 5 dB reduction in sound.~~ The wall design shall be coordinated with the City of Roseville. The wall or a combination of wall and setbacks shall result in achievement of Pacer County noise standards.

In response to comment 4-18 and to clarify what type of concrete is required, Mitigation Measure 4.11-5a on page 4.11-43 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-5a: Reduce noise levels associated with new, expanded, or extended roads (Net SAP Area and PRSP Area)

Before finalizing roadway design for roadway expansion or new roadway construction, a design-level acoustical study shall be prepared to identify specific roadway design considerations, which shall be incorporated into final road design and approved by Placer County for roadways that result in a substantial increase in noise identified by Tables 4.11-12, 4.11-13, and 4.11-14. Roadway segments outside of Placer County are excluded (Fiddyment Road extension, Foothills Boulevard extension, and Woodcreek Oaks Boulevard extension). The following design features shall be considered:

- Roadway design shall provide sufficient setback between occupied structures that are defined as sensitive land uses by Placer County (or planned future sensitive land uses) and the roadway to minimize noise exposure to the extent feasible.
- In locations where setback is not feasible to reduce noise levels at existing or planned future sensitive receptors, roadway design shall incorporate quiet pavement types such as rubberized asphalt concrete (RAC) achieving at least a 4-dB decrease in traffic noise where feasible.
- Where existing sensitive receptors are located such that neither setback, nor quiet pavement, can reduce traffic noise from new or expanded roads associated with the project, the County shall coordinate with property owners of the existing residences regarding installation of sound walls along property lines to minimize traffic noise to meet exterior noise standards (city or County, as applicable) and, if necessary to meet the 45-dBA interior noise standards, upgrading windows that face the new or extended roadway.

2.1.16 Revisions to Section 4.12, "Population, Employment, and Housing"

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 4.12-7 on page 4.12-10 of the Draft EIR is revised as follows:

Table 4.12-7 Project Housing, Population, and Employment at Buildout

	Net SAP Area	PRSP Area	Total
Housing units[1]	2,458	5,636	8,094
Population[1]	6,095	13,219	19,314
Jobs[2]	40,804	14,956	55,760

Data compiled by Ascent Environmental in 2017

[1] Does not include Sac State–Placer Center housing or population.
[2] Includes jobs within Sac State–Placer Center site.

2.1.17 Revisions to Section 4.13, "Public Services"

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The last paragraph on page 4.13-18 of the Draft EIR is revised as follows:

Thus, for projects under the jurisdiction of Placer County, either the parks and recreation facilities requirements must be enumerated in the specific plan, or they default to requirements in the zoning ordinance. The zoning ordinance requires consistency with general plan goals (5 acres of passive

and 5 acres of improved parkland per 1,000 residents), with specific ratios and credits based on development type, as defined (planned development, subdivision, and so on). See Chapters 15, 16, and 17 of the *Placer County Code* for specific requirements).

In response to comment 3-19, the fourth bullet on page 4.13-22 of the Draft EIR is revised as follows:

- ~~**Policy PFS-2.9: Consultation with Neighboring Cities.** The County shall consult with the cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area.~~

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4.13-26 of the Draft EIR is revised as follows:

PRSP Area

Implementing the PRSP would result in development on approximately 2,200 acres of previously undeveloped land and result in 13,219 new residents, up to 30,000 students and associated faculty and staff, and potentially up to 5,000 on-site student housing ~~units~~ beds and 200 on-site faculty/staff housing units in a primarily undeveloped portion of west Placer County, resulting in an increase in demand for fire protection and emergency response services similar to that described above for the net SAP area. As shown in Table 3.14-5, implementing the PRSP, including the Sac State–Placer Center, could create demand for up to 21 firefighters and four support/planning personnel.

In response to comment 3-15 and to provide additional clarity regarding timing, Mitigation Measure 4.13-1b on page 4.13-27 of the Draft EIR is revised as follows:

Mitigation Measure 4.13-1b: Fire stations (Net SAP Area and PRSP Area)

A minimum of two fire stations ~~shall be constructed~~ are needed to serve the net SAP and PRSP areas. Both fire stations will be located within the SAP/PRSP area and shall be fully funded and equipped. ~~The specific locations for the fire stations and fire station design will be identified in coordination with the Placer County Fire Department.~~ The first fire station already exists in the net SAP area and is known as Station #77. PRSP Parcel PR-71 has been identified for the second station or any parcel within the PRSP area with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. The fire station~~s~~ will be constructed as needed to serve development and maintain staffing ratios. Placer County Fire anticipates that the second fire station will be needed at approximately 25 percent buildout of the PRSP. The second fire station's location, design, and construction will be identified in coordination with Placer County Fire, and the fire station will be constructed as its necessity is determined by the County based upon development and staffing ratios. The timing and triggers for construction of the fire station are outlined in the PRSP Development Agreement. Funding shall be provided pursuant to Mitigation Measure 4.13-1a.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-2 on page 4.13-27 of the Draft EIR is revised as follows:

Impact 4.13-2: Increased demand for law enforcement services

Implementation of the project would allow for the development of more than 2,400 dwelling units in the net SAP area and more than 5,600 dwelling units in the PRSP area. In addition, on-campus housing for students, faculty, and staff may be provided. The increase in the number of residences and jobs in the project area would generate demand for at least 19 additional Placer County Sheriff officers, assuming the Sac State–Placer Center would provide its own law enforcement personnel and facilities. A sheriff's substation is currently planned as part of the Placer Vineyards Specific Plan and would serve the project area and would be designed to accommodate the additional officers

generated by the project. Individual residential projects in the SAP area would pay the County Public Facilities Impact Fee toward their fair share of demand for law enforcement facilities in compliance with SAP Policies PFS-7.1 and PFS-7.2 and Placer County General Plan Policy 4.H.4. The Sac State–Placer Center would provide its own law enforcement personnel and facilities. Implementation of the project would increase demand for law enforcement services; because Placer County has policies in place to fund, staff, and maintain adequate law enforcement facilities and services, no adverse effect on such levels of service would occur; however, no specific funding mechanism are in place for the project. Therefore, the impact would be **potentially significant**.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The second paragraph on page 4.13-29 of the Draft EIR is revised as follows:

PRSP Area

Law enforcement for the PRSP area would be provided by CHP, ~~and~~ the Placer County Sheriff's Office, and CSU Sacramento. Implementing the PRSP would affect CHP services in a manner similar to that described above for the net SAP area. Implementing the PRSP is anticipated to generate up to 5,636 dwelling units, 13,219 residents, up to 30,000 students and associated faculty and staff, and potentially up to 5,000 on-site student housing ~~units~~ beds and 200 on-site faculty/staff housing units, which would create additional demand for law enforcement services. Future development in the PRSP area would implement SAP policies and *Placer County General Plan* policies pertaining to law enforcement staffing and emergency response standards described above for the net SAP area. As shown in Table 4.13-6, buildout of the PRSP area would generate demand for 16 officers with the potential for additional demand for officers associated with nonresidential development in the PRSP area. Thus, implementing the PRSP would be anticipated to create demand for officers greater than the need indicated in Table 4.13-6. Increased demand for law enforcement facilities and services associated with the Sac State–Placer Center would be met through law enforcement staff, facilities, and services provided by CSU Sacramento on the campus.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The last paragraph on page 4.13-31 of the Draft EIR is revised as follows:

PRSP Area

The PRSP area is served by schools in the RCSD and RJUHSD, with a small portion of PRSP's campus park land use located within the Western Placer Unified School District, which is not assumed to generate a student population. As described under "Schools" in Section 4.13.2, above, schools in the RCSD and RJUHSD have available capacity to serve additional students. The number of students estimated to be generated by buildout of residential development in the PRSP area is shown in Table 4.13-8. Implementing the PRSP would generate approximately 1,261, 435, and 583 elementary, middle, and high school students, respectively. Housing to serve up to 200 faculty or staff members may be provided in the Sac State–Placer Center; if it is, it also could generate additional students in the RCSD and RJUHSD. The student generation calculation includes the 200 faculty/staff units as LDR/MDR units, as shown in Table 4.13-8.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. The impact summary for Impact 4.13-4 on page 4.13-33 of the Draft EIR is revised as follows:

Impact 4.13-4: Increased demand for library services

Implementation of the SAP would allow for development of more than 2,400 dwelling units, and the PRSP would create more than 5,600 dwelling units. In addition, on-campus housing for students, faculty, and staff may be developed. The increase in the number of residences in the project area would increase demand for library services from County libraries in Rocklin, as well as the nearest City of Roseville library. Individual residential projects in the project area would pay the County Public Facilities Impact Fee toward their fair share of demand for library facilities in compliance with SAP

Policies PFS-1.2, PFS-2.1, PFS-2.2, and PFS-2.3 and Placer County General Plan Policies 4.A.2 and 4.A.5. The Sac State–Placer Center would provide its own library services. Because Placer County has policies place to fund, staff, and maintain adequate library facilities and services, no adverse effect to library services would occur; however, no specific funding mechanism for the project are currently in place. The impact would therefore be **potentially significant**.

County staff initiated the following text revision to Mitigation Measure 4.13-4 on page 4.13-35 of the Draft EIR in order to provide additional interim library service.

Mitigation Measure 4.13-4: Create or annex into a CFD for library services (Net SAP Area and PRSP Area)

Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a CFD, CSA Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding supplemental revenue for library facilities, operations, and maintenance. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for library services is in place to provide adequate library services to the net SAP area and PRSP area during all stages of development. The County will provide interim library services through one or more means, including usage of the Bookmobile to provide temporary library services, establishment of a satellite library office within SAP or immediately adjacent to, or establishment of a satellite office at 1000 Sunset Boulevard, Rocklin, CA 95677 or other equivalent means beginning at 25 percent buildout of the PRSP or as otherwise determined by the County. These interim library services may become permanent means to provide library services to the plan area if a regional library is not constructed to serve the plan area or a joint partnership with the University has not been agreed to, to provide library services to PRSP before buildout of 75 percent of the DUE's in the plan area or as determined by the County.

To clarify the impact conclusion for Impact 4.13-9 as a result of revisions to Mitigation Measure 4.13-1b (shown above), the first paragraph on page 4.13-43 of the Draft EIR is revised as follows:

Fire services are provided based on established service standards reflected in the *Placer County General Plan* and requirements of Placer County Fire. Cumulative development projects listed in Table 4.0-2 are either located outside of the service area of Station #77; are located within the city limits for Lincoln, Rocklin, or Roseville and are served by their respective fire departments, or would be annexed into one of these cities, such as Amoruso Ranch, for example. Therefore, implementation of the project would not cumulatively combine with other projects to result in a significant cumulative impact on fire protection and emergency response services. As described in Impact 4.13-1, future development in the net SAP area would be annexed into CFD No. 2012-1. As discussed in Chapter 3, "Project Description," implementation of the PRSP would require construction of a new fire station, which would accommodate increased demand for fire protection services resulting from implementation of the SAP, including the PRSP. Implementation of the PRSP would also include formation of a County Service Area Zone of Benefit; formation of a CFD; and/or annexation into CFD No. 2012-1 (Sunset Area Fire and Emergency Services), including a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for fire protection services, infrastructure, and equipment is in place to provide adequate fire safety services to the PRSP area during all stages of development. The provision of fire protection and emergency services to the Sac State–Placer Center would be subject to provisions noted in the PRSP Development Agreement. With annexation into CDF No. 2012-1, establishment of appropriate funding mechanisms described, compliance with County policies, and implementation of Mitigation Measures 4.13-1 and 4.3-6, which would require funding for fire protection service to be in place prior to development and construction of a~~two~~ new fire station~~s~~, implementing the project would not result in a considerable contribution to a cumulative impact on fire protection and emergency response services. The impact would be **less than significant**.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Cumulative Impact 4.13-10 on page 4.13-43 of the Draft EIR is revised as follows:

Cumulative Impact 4.13-10: Cumulative increase in demand for law enforcement services

Existing law enforcement services in the project area are sufficient to meet existing demand. Cumulative development listed in Table 4.0-2 and located in unincorporated western Placer County would result in growth that would place additional demand on existing law enforcement services, resulting in a potentially significant cumulative impact on existing law enforcement services and facilities. However, these development projects would be required by the County to pay the Public Facilities Impact Fee, which would include a fair-share contribution to meet demand for law enforcement facilities. Projects in Table 4.0-2 that are located in surrounding cities would be required to pay similar fees for provision of adequate law enforcement service. As required by Mitigation Measure 4.12-2, future development in the project area (excluding Sac State–Placer Center, which would provide its own law enforcement services) would also contribute its fair share toward the cost of providing law enforcement services and facilities through payment of the County Public Facilities Impact Fee, and County policies would require future project development to contribute fees toward the provision of law enforcement officers. With payment of the County Public Facilities Impact Fee, implementing the project would not result in a considerable contribution to a cumulative impact on law enforcement services. The impact would be **less than significant**.

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Cumulative Impact 4.13-12 on page 4.13-44 of the Draft EIR is revised as follows:

Cumulative Impact 4.13-12: Cumulative increase in demand for library services

Library services in Placer County, the City of Rocklin, and the City of Roseville are not meeting the operational and facility goals of their respective jurisdictions. As development has occurred in Placer County, Rocklin, and Roseville, funding for expanding library services and facilities to meet growing demand associated with development has not been available. Cumulative development listed in Table 4.0-2 would result in development of more than 50,000 acres in the region, including the addition of more than 100,000 residential units and millions of square feet of non-residential building floor area. Projects located in Rocklin, Roseville, and unincorporated Placer County would result in growth that would place additional demand on existing library facilities, a significant cumulative impact on existing library services and facilities would occur. However, these development projects would be required by their respective jurisdictions to pay fees that would support expanding library services and providing additional facilities. The Village 5 Specific Plan recognizes that a new library could be constructed in the specific plan area or elsewhere in the City of Lincoln (City of Lincoln 2016:3.14-29 through 3.14-31). Additionally, Implementation of the project could cumulatively combine with other projects to result in a significant cumulative impact on library services and facilities. However, as required by Mitigation Measure 4.12-4, future development in the project area (excluding Sac State–Placer Center, which would provide its own library services) would contribute its fair share toward the cost of providing library facilities through payment of the County Public Facilities Impact Fee, and future project development would be required to contribute fees toward the provision of staffing and continued operation of public library services and facilities. With payment of the County Public Facilities Impact Fee, implementing the project would not result in a considerable contribution to a cumulative impact on library services and facilities. This impact would be **less than significant**.

2.1.18 Revisions to Section 4.14, "Transportation and Circulation"

In response to comment 4-63 and to correct the inadvertent omission in the Draft EIR of a reference to the a.m. peak hour in the City of Roseville General Plan LOS Policy, the bullet on page 4.14-29 of the Draft EIR is revised as follows:

- **Level of Service Policy 1**: Maintain a level of service (LOS) "C" standard at a minimum of 70 percent of all signalized intersections and roadway segments in the City during the a.m. and p.m. peak hours. Exceptions to the LOS "C" standard may be considered for intersections where the City finds that the required improvements are unacceptable based on established criteria identified in the implementation measures. In addition, Pedestrian Districts may be exempted from the LOS standard.

In response to comments regarding development capacity (for example, comment 4-13) and to provide the requirement for future traffic analysis for projects that exceed the 20-year horizon forecast, SAP Policy TM-1.9 on page 4.14-40 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- **Policy TM-1.9: Additional Traffic Impact Mitigation.** The County ~~shall~~ may require ~~applicants~~ further traffic analysis for land development projects ~~to demonstrate consistency~~ that are not consistent with the EIR land use assumptions ~~of the EIR~~ for this Plan. ~~For projects that exceed these assumptions, the County will require additional traffic analysis and mitigation of impacts identified in the analysis.~~ Future projects that exceed the level of development evaluated under the EIR's projected 20-year development scenario (see EIR Table 3-3), will be required to prepare individual, project-specific traffic analysis, and identify specific mitigation measures to mitigate impacts as necessary. Mitigation could include contribution to funding of transportation system improvement (e.g., traffic fees, VMT fees) and/or dedication of right-of-way for future improvements.

To provide a correction, Mitigation Measure 4.14-1a on page 4.14-51 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1a: Widen Sunset Boulevard to four lanes from PRSP boundary to Placer Corporate Drive/South Loop Road (~~Net SAP Area and~~ PRSP Area)

The Placer County Countywide CIP (Placer County 2018c) includes funding for the widening of Sunset Boulevard to four lanes from Cincinnati Avenue to SR 65. Prior to issuance of building permits, project proponents of development projects within the ~~SAP area, including the~~ PRSP area, shall pay the applicable countywide traffic impact fees that are in effect in this area (Sunset District) pursuant to the applicable ordinances and resolutions, which will provide funding towards this improvement. The constructing party shall be eligible for fee credits for the applicable countywide traffic impact fees, as determined by DPWF.

To provide a correction, Mitigation Measure 4.14-1b on page 4.14-51 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-1b: Construct extension of Foothills Boulevard as a four-lane arterial between PRSP area and its current northern terminus in City of Roseville (Net SAP Area and PRSP Area)

To provide a correction, the second full paragraph on page 4.14-56 of the Draft EIR is revised as follows:

Mitigation Measures

Implement Mitigation Measures 4.14-1a (~~Net SAP Area and~~ PRSP Area) and 4.14-1b (Net SAP Area and PRSP Area). Widening Sunset Boulevard to 4 lanes (Mitigation Measure 4.14-1a) would improve operations to an acceptable LOS C or better at the Sunset Boulevard / Cincinnati Avenue intersection. Widening Sunset Boulevard in connection with the opening of Phase I of Placer Parkway to traffic would also shift traffic demand from the Athens Avenue / Industrial Avenue intersection, which would improve operations to an acceptable LOS C. Furthermore, these two improvements in connection with the extension of Foothills Boulevard (Mitigation Measure 4.14-1b) would improve operations to an acceptable LOS C or better at the following project intersections.

To provide a correction, the last paragraph on page 4.14-58 continuing to page 4.14-59 of the Draft EIR is revised as follows:

Overall Significance after Mitigation

This impact would be **significant** from the time that project trips cause these intersections to begin operating at an unacceptable LOS (i.e., LOS D for intersections with a LOS C standard, or LOS E for intersections with an LOS D standard); or in the case of intersections that already operate at an unacceptable LOS, from the time that project trips result in a significant increase in delay as defined in the significance criteria for Placer County intersections. As noted above, this impact would remain **significant and unavoidable in the short-term** until the applicable roadway network improvements identified in the Dry Creek Benefit District of the Placer County Countywide CIP as well as improvements identified in Mitigation Measures 4.14-1a (~~Net SAP Area and~~ PRSP Area) and 4.14-1b (Net SAP Area and PRSP Area) are implemented. Similarly, the intersections that would be improved by projects not currently in the Placer County Countywide CIP but are proposed to be included as part of Mitigation Measure 4.14-2c would remain **significant and unavoidable in the short-term** until the Countywide CIP update is adopted with the improvements included.

To provide a correction, the first paragraph on page 4.14-62 of the Draft EIR is revised as follows:

Mitigation Measures

Implement Mitigation Measures 4.14-1a (~~Net SAP Area and~~ PRSP Area), 4.14-1b (Net SAP Area and PRSP Area), and 4.14-10 (Net SAP Area and PRSP Area). These measures include widening Sunset Boulevard, extending Foothills Boulevard between the PRSP area and City of Roseville, and capacity enhancements to SR 65, including payment of fees. These improvements in combination with the planned opening of Phase I of Placer Parkway would shift traffic demand from the following City of Roseville intersections, which would improve operations to an acceptable LOS C or better:

In response to comment 4-73, the first full paragraph of Mitigation Measure 4.14-3 on page 4.14-64 of the Draft EIR is revised as follows:

Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers,

must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

To provide a correction, the second paragraph on page 4.14-70 of the Draft EIR is revised as follows:

Mitigation Measures

Implement Mitigation Measure 4.14-1b (Net SAP Area and PRSP Area). The extension of Foothills Boulevard between the PRSP area and City of Roseville would shift traffic demand from Woodcreek Oaks Boulevard to Foothills Boulevard. With this reduction in traffic on Woodcreek Oaks Boulevard, the Woodcreek Oaks Boulevard / Northpark Drive and Woodcreek Oaks Boulevard / Parkside Way intersections would no longer meet the MUTCD peak hour signal warrant under existing plus PRSP conditions.

In response to comment 4-73, the second full paragraph of Mitigation Measure 4.14-4 on page 4.14-71 of the Draft EIR is revised as follows:

As with Mitigation Measure 4.14-3, Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.

In response to comment 1-3, Mitigation Measure 4.14-10 on page 4.14-86 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-10: Contribute fair share of feasible physical improvements to freeway operations (Net SAP Area and PRSP Area).

Prior to building permit issuance, project proponents of individual development projects within the SAP area shall be responsible for the project's fair share of all feasible physical improvements necessary and available to reduce the severity of the project's significant traffic impacts to freeway operations as identified in this traffic analysis consistent with the policies and exceptions set forth in the Transportation and Circulation Element of the Placer County General Plan. This may include any, or some combination of, the following forms:

- Payment of impact fees to the South Placer Regional Transportation Authority (SPRTA) in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities funded through fees collected by the SPRTA for Tier 1 and/or Tier 2 projects. This includes the following transportation projects that would directly improve operations on SR 65 and I-80:
  - SR 65 Widening, including auxiliary lanes and a mainline mixed-flow or HOV travel lane
  - I-80/SR 65 Interchange, and
  - I-80/Rocklin Road Interchange
- Payment of other adopted and applicable regional impact fees that would provide improvements to freeway facilities that are affected by multiple jurisdictions, such as the Highway 65 JPA Fee, which provides funding for interchange improvements along SR 65.
- Placer County shall coordinate with their regional partners to modify an existing or adopt a new regional fee program to include the improvements identified that will constitute the regions fair share toward the identified improvements. These improvements may include:
  - Add ramp metering to high occupancy vehicle (HOV) lane entrance ramps on SR 65
  - Add auxiliary lanes to SR 65

In response to several comments regarding proposed transportation-related GHG mitigation measures, Mitigation Measure 4.14-13a on page 4.14-92 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-13a: Prepare a transit master plan for SAP area (Net SAP Area and PRSP Area)

The County shall prepare a transit master plan for the SAP area, including the PRSP area. The transit master plan will be a County-led effort but may also be done in collaboration with PCTPA when PCTPA updates its Long-Range Transit Master Plan. Roseville Transit will also be consulted. The transit master plan shall identify how transit service will be delivered to the SAP and ensure that the service adequately serves transit demand in the SAP. Transit service could include but would not be limited to car-sharing programs, neighborhood electric vehicle systems, and free or low-cost monthly transit passes.

To provide a correction, Mitigation Measure 4.14-15b on page 4.14-115 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15b: Require dedication of right of way to widen Fiddyment Road to six lanes from Athens Avenue to E. Catlett Road (Net SAP Area ~~and PRSP Area~~)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area~~, including the PRSP area,~~ shall dedicate sufficient right-of-way to widen Fiddyment Road to 6 lanes from Athens Avenue to E. Catlett Road in the future.

To provide a correction, Mitigation Measure 4.14-15c on page 4.14-115 of the Draft EIR is revised as follows:

Mitigation Measure 4.14-15c: Require dedication of right-of-way to widen Sunset Boulevard to eight lanes from Placer Corporate Drive/South Loop Road to SR 65 (Net SAP Area ~~and PRSP Area~~)

Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area~~, including the PRSP area,~~ shall

dedicate sufficient right-of-way to widen Sunset Boulevard to 8 lanes from Placer Corporate Drive/South Loop Road to SR 65 in the future. Any development proposed on parcels affected by the future 8 lane facility shall be required as a condition of approval to provide an irrevocable offer of dedication to Placer County for a highway easement to accommodate the future 8 lane roadway improvements.

2.1.19 Revisions to Section 4.15, "Utilities"

In response to comment 7-9 and to provide a minor correction related to the timing of the Ophir water treatment plant (WTP), the third paragraph on page 4.15-4 of the Draft EIR is revised as follows:

> The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. ~~PCWA also plans to begin construction in 2018 on~~ tThe first phase of the Ophir WTP and associated conveyance pipelines~~, which are currently under design and~~ would provide treatment capacity of 10 mgd. The Ophir WTP would be constructed in three phases, for a total treatment capacity of 30 mgd (PCWA 2016a:3–4,39).

In response to comment 4-83 and to provide a minor clarification, the first paragraph on page 4.15-9 of the Draft EIR is revised as follows:

> Wastewater collection facilities are in place to serve existing land uses in the SAP area and are provided through County Service Area (CSA) 28, Zone of Benefit 2A3. CSA Zones of Benefit have been developed in Placer County to own and operate utility systems and to assess customers of separate, specific areas based upon the costs of serving those areas. CSA 28, Zone of Benefit 2A3 was established to provide sewer services to the SAP area. The boundary of CSA 28, Zone of Benefit 2A3 includes all existing developed property in the net SAP area. As new development comes on line, it is required to annex to the CSA Zone of Benefit to connect to existing sewer collection facilities. SPWA partners (Placer County, SPMUD, and the City of Roseville) work together to monitor growth, plan for treatment plant expansions, and ensure that adequate wastewater treatment capacity is available in the SPWA area. Funding for CSA services are provided through property assessments. New development also must pay local and regional connection fees. The local connection fee is collected by the CSA and regional fees are forwarded to the City of Roseville as the contribution by the CSA Zone of Benefit toward payment of the bond debt related to the construction of the regional wastewater facilities (Placer County 2017a:12).

To provide a correction, the following new text is added to page 4.15-14 of the Draft EIR immediately preceding the section "Natural Gas":

> ### Pioneer Community Energy
> Pioneer Community Energy is a community choice aggregator organized under a joint exercise of powers agreement between Placer County and the cities of Auburn, Colfax, Lincoln, Rocklin and Town of Loomis. It is organized for the purpose of providing electric generation and related electric services within the territory of its member jurisdictions.

In response to comment 4-85 and to provide a minor clarification, the second full paragraph on page 4.15-25 of the Draft EIR is revised as follows:

> The SPWA is a joint powers authority formed to fund regional wastewater ~~and recycled water~~ facilities in southwestern Placer County for three partner agencies (the "participants"): City of Roseville, SPMUD, and Placer County. The regional facilities funded by the SPWA include trunk sewer lines and two wastewater treatment plants (WWTPs). All three participants transmit wastewater to these WWTPs. SPWA monitors compliance with funding and operational criteria established in the Funding and Operations Agreements among the participants.

In response to comment 3-19, the fourth bullet on page 4.15-33 of the Draft EIR is revised as follows:

- ~~**Policy PFS-2.9: Consultation with Neighboring Cities.** The County shall consult with the cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area.~~

In response to comment 7-11 and to require additional water quality testing to ensure safety, SAP Policy PFS-3.1 on page 4.15-33 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- **Policy PFS-3.1: Water Supply Certification.** The County shall require applicants for new development approval to demonstrate the availability of a long-term, reliable surface water supply for all urban uses as well as recycled water, where available, as an optional water supply. The County shall require written certification from the water service provider that a long-term water supply is or will be available for the new development prior to occupancy. The County will also require any proposed on-site wells used for potable water to be evaluated to ensure the groundwater meets California Drinking Water Standards and, if not, that the well is either appropriately relocated (at the applicant's expense) or any necessary water treatment processes and monitoring systems are installed and operating.

In response to comment 4-84, SAP Policy PFS-4.1 on pages 4.15-33 and 4.15-34 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- **Policy PFS-4.1: Wastewater Management.** The County shall coordinate with the Cities of Lincoln and Roseville to ensure efficient and effective management of wastewater. This includes ensuring that development projects proposed in the Sunset Area have access to sufficient capacity at either the Lincoln Wastewater Treatment and Reclamation Facility or the City of Roseville ~~Pleasant Grove~~ Wastewater Treatment Plants. For projects which exceed the planned wastewater and/or recycled water capacities outlined in the South Placer Wastewater Authority's South Placer Regional Wastewater and Recycled Water Systems Evaluation report, the County shall require project proponents to conduct additional wastewater and/or recycled water analysis and if supply is available projects will need to mitigate impacts identified in the analysis. Mitigation could include contribution to fund future infrastructure system improvements and expansion.

To provide a revision to SAP Policy NR-6.7, the seventh bullet on page 4.15-36 of the Draft EIR is revised as follows:

- **Policy NR-6.7: Residential Energy Efficiency.** The County shall require ~~encourage~~ new residential units to be designed and constructed to maximize energy efficiency. This ~~should~~ shall include ~~consideration of~~ the following design features:

  a) Installation of solar photovoltaic systems ~~Pre-plumbing and structural design to accommodate solar energy systems~~.

  b) Installation of energy conservation appliances such as tankless water heaters and whole house fans in all residential units.

  c) Installation of energy efficient AC units and heating system with programmable thermostat timers, to the extent feasible.

  d) Use of low flow water fixtures such as low flow toilets and faucets, to the extent feasible.

In response to comment 7-15 and to provide a minor clarification, the fourth paragraph on page 4.15-40 of the Draft EIR is revised as follows:

> As shown in Exhibit 4.15-4, PCWA transmission main pipelines would be extended through the PRSP area. The water distribution system in the PRSP area would consist of looping pipelines that form a transmission main grid consisting of 12-inch to 42-inch-diameter mains. The pipelines would be installed within collector and arterial roadway corridors. The system would include a 5.16-million-gallon potable water storage tank (co-located with a pump station and supply lay-down area) in the northwestern portion of the PRSP area, near Placer Parkway. Prior to construction of the water storage tank, site-specific geotechnical analysis would be prepared to confirm site suitability for the storage tank. The key components of the proposed potable water infrastructure system are shown in Exhibit 4.15-4. Note that the PCWA water transmission pipeline that would be installed in the Placer Parkway right-of-way is not identified in Exhibit 4.14-4. Please refer to Exhibit 3-3 for the location of the PCWA pipeline in Placer Parkway.

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area, the impact summary and the last paragraph on page 4.15-47 of the Draft EIR are revised as follows:

Impact 4.15-4: Increased demand for wastewater treatment services

The wastewater flows generated by buildout of the PRSP and net SAP areas are estimated to be 1.99 and ~~3.78~~ 3.8 mgd, respectively, for a combined total of 5.77 mgd ADWF. The PGWWTP currently treats 7.1 mgd ADWF, has an operating treatment capacity of 9.5 mgd ADWF, and is permitted to discharge 12 mgd ADWF in compliance with its NPDES Permit. The plant has available capacity to treat an estimated 2.4 mgd. While wastewater flows from the PRSP area alone could be treated at the PGWWTP, the wastewater collection system would be designed to convey combined buildout flows from both the net SAP and PRSP areas to the PGWWTP. Therefore, any volume beyond that allowed by the PGWWTP's existing NPDES permit would be require additional capacity and a new permit that would identify wastewater treatment requirements. Wastewater flows from the PRSP area would not cause permit limits to be exceeded, but the PGWWTP would not have sufficient capacity to treat the estimated combined wastewater flows from buildout of the net SAP and the PRSP areas. Placer County requires project proponents to obtain written confirmation from SPWA to demonstrate that wastewater treatment services would be provided. While wastewater treatment capacity is sufficient in the nearer term to accommodate buildout of the PRSP area (over approximately 20 years), it is currently insufficient to serve treatment needs from ultimate buildout of the net SAP (over approximately 80 years) and PRSP areas. The project's wastewater flows would require eventual expansion of the PGWWTP. The impact of increased demand for wastewater treatment services would be **significant**.

Net SAP Area

Buildout of the net SAP area would generate an estimated ~~3.78~~ 3.8 mgd of wastewater during periods of ADWF, as shown in Table 4.15-10. This figure includes 0.2 mgd from the Lincoln 270 area between Industrial Boulevard and SR 65, which is not part of the net SAP area, but that could flow through the net SAP area to the PGWWTP (Table 4.15-10). To calculate flows for the net SAP area, flow rates consistent with the System Evaluation report were applied to the proposed land uses. As shown in Exhibit 4.15-3, the portion of the net SAP area east of Fiddyment Road is located within the Regional Service Area Boundary of the PGWWTP, but the approximately 1,700-acre portion west of Fiddyment Road is outside the Ultimate Service Area boundary. This area is projected to generate an ADWF of 1.14 mgd. However, there are areas within the studied watershed that would generate little or no flow and some existing areas may be generating less flow than assumed in the Systems Evaluation.

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area, the second full paragraph and Table 4.15-10 on page 4.15-48 of the Draft EIR are revised as follows:

> On April 5, 2017, the City of Roseville approved a project to expand the PGWWTP treatment capacity, which would increase the treatment capacity from 9.5 mgd to 12 mgd (City of Roseville 2017c). Construction of the PGWWTP expansion project is anticipated to begin in 2018 and be completed within 2 years. Once the PGWWTP expansion project is complete, and with existing treatment flows, the estimated available capacity of the PGWWTP would be 4.9 mgd ADWF, which would be sufficient to serve net SAP buildout flows of ~~3.78~~ 3.8 mgd.

Table 4.15-10 Net Sunset Area Plan Area Wastewater Flows

Land Use	Flow Rate (gpd/ac) or (gpd/du)	Area Size (acres)	EDUs[1]	ADWF (mgd)
General Commercial	850	34	-	0.03
Entertainment Mixed-Use	2,300	418	-	0.96
Residential	190	52	2,458	~~0.45~~ 0.47
Casino[2]	-	47	-	0.25
Business Park	850	142	-	0.12
Innovation Center	850	1,058	-	0.90
Eco-Industrial[3]	850	200	-	0.17
EDUs[1]	190	-	200	0.04
Light Industrial	850	744	-	0.63
Public Facility	850	2	-	0.002
Preserve/Mitigation Reserve	-	1,943	-	0.00
Lincoln 270 Area[4]	-	-	-	0.23
TOTAL	**NA**	**4,827**	**2,458**	~~3.782~~ 3.802

Notes: ADWF = average dry weather flow, ac = acre, du = dwelling unit, EDU = equivalent dwelling unit, gpd = gallons per day, mgd = million gallons per day, NA = not applicable.

[1] EDUs not included in total residential dwelling units for the SAP. EDUs are generally defined as a unit of measure for the sewage generated from particular buildings, structures or uses. One equivalent dwelling unit is equal to an approximation of the amount of sewage generated by an average single-family residence.

[2] ADWF from Athens Avenue Sewer Study.

[3] Only 200 acres of the Eco-Industrial land use designation generate sewage.

[4] Area outside the SAP area, ADWF from Athens Avenue Sewer Study.

Source: Placer County 2017a:15

As a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 4.15-13 on page 4.15-56 of the Draft EIR is revised as follows:

Table 4.15-13 Estimated Solid Waste Generated by Operation of the Sunset Area Plan and the Placer Ranch Specific Plan

Land Use Designation	Estimated Residents	Jobs	Non-Residential Disposal Rate (tons/employee/year)	Residential Disposal Rate (lb/resident/day)	Non-Residential Waste (tons/day)	Non-Residential Waste (tons/year)	Non-Residential Waste (cubic yards/year)	Residential Waste (tons/day)	Residential Waste (tons/year)	Residential Waste (cubic yards/year)	Generation Total (tons/day)	Generation Total (tons/year)	Generation Total (cubic yards/year)	Disposal Total (cubic yards/year)[1]
Net SAP Area														
General Commercial	0	440	1.52	7	1.83	669	892	0.00	0	0	1.83	669	892	446
Entertainment Mixed-Use	929	6,120	1.52		25.49	9,302	12,403	3.25	1,187	1,582	28.74	10,489	13,986	6,993
Business Park	0	2,210	0.79		4.78	1,746	2,328	0.00	0	0	4.78	1,746	2,328	1,164
Innovation Center	5,166	24,000	0.79		51.95	18,960	25,280	18.08	6,600	8,799	70.03	25,560	34,079	17,050
Eco-Industrial	0	7,920	0.64		13.89	5,069	6,758	0.00	0	0	13.89	5,069	6,758	3,379
Light Industrial	0	3,530	0.64		6.19	2,259	3,012	0.00	0	0	6.19	2,259	3,012	1,506
Total	**6,095**	**44,220**	**NA**	**NA**	**104.12**	**38,005**	**50,673**	**21.33**	**7,786**	**10,382**	**125.46**	**45,791**	**61,055**	**30,528**
PRSP Area														
Residential	13,219	0	0	7	0	0	0	46.27	16,887	22,515	46.27	16,887	22,515	11,258
University	~~13,219~~	5,733	0.38		5.97	2,179	2,905	~~46.27~~ 0	~~16,887~~ 0	~~22,515~~ 0	~~52.24~~ 5.97	~~19,066~~ 2,179	~~25,420~~ 2,905	~~12,710~~ 1,452
Campus Park		7,354	0.79		15.92	5,810	7,746	0	0	0	15.92	5,810	7,746	3,873
General Commercial		593	1.52		2.47	901	1,201	0	0	0	2.47	901	1,201	601
Commercial Mixed Use		1,275	1.52		5.31	1,938	2,584	0	0	0	5.31	1,938	2,584	1,292
Total	**13,219**	**14,955**	**NA**	**NA**	**29.67**	**10,828**	**14,436**	**46.27**	**16,887**	**22,515**	**75.94**	**27,715**	**36,951**	**18,476**
Total (net SAP area + PRSP area)	**19,314**	**59,175**	**NA**	**NA**	**133.79**	**48,833**	**65,109**	**67.60**	**24,673**	**32,897**	**201.40**	**73,506**	**98,006**	**49,004**

Notes: lb = pounds, NA = not available.

[1] Total waste requiring disposal calculated by applying state-mandated solid waste recycling and diversion requirement of 50%.

Source: CalRecycle 2017b

To provide a minor correction to the amount of wastewater flows that would be generated by buildout of the net SAP area (see correction to Table 4.15-10, above), Table 4.15-14 on pages 4.15-67 and 4.15-68 of the Draft EIR is revised as follows:

Table 4.15-14 Summary of Buildout Average Dry Weather Flows for the SPWA Service Boundaries

Description of Area	Wastewater Flows (mgd)
2005 PGWWTP Regional Service Area[1]	15.62
Curry Creek Specific Plan	2.72
Regional University	1.17
Inviro Tech	0.08
Orchard Creek	0.02
Creekview Specific Plan	0.37
Sierra Vista	1.37
Amoruso Ranch Specific Plan	0.61
~~p~~Placer Ranch	1.99
Sunset Area Plan[2]	~~3.78~~ 3.8
Total[1]	~~27.73~~27.75
Evaluated Treatment Facility Capacity Expansion	29.50[3]
	24.70[4]
	25.67[5]

Notes: ADWF = average dry weather flow, mgd = million gallons per day.

[1] 2005 PGWWTP Regional Service Area wastewater flows were revised from the Systems Evaluation estimates to exclude flows from Placer Ranch; however, insufficient detail was available to exclude flows that were estimated for the Placer County portion of the regional service area boundary and ultimate service area boundary that contains the SAP area. Thus, the total estimate of wastewater flows for buildout within the SPWA service boundaries is conservative. The Regional Service Area boundary also includes anticipated flows from the West Roseville Specific Plan.

[2] SAP estimated wastewater flows include 0.23 mgd ADWF generated within the Lincoln 270 area, which is outside SAP area but included in the Athens Avenue Sewer Study.

[3] The WWMP EIR included analysis of expanding the PGWWTP to 29.50 mgd ADWF.

[4] The WRSP Final EIR included analysis of expanding the PGWWTP to 24.70 mgd ADWF.

[5] The Systems Evaluation included analysis of expanding the PGWWTP to 25.67 mgd ADWF.

Sources: City of Roseville 1996:2-10, 2-34 and 2-35; City of Roseville 2004:4.11-70 through 4.11-75; City of Roseville 2010:4.12.3-19; City of Roseville 2011:4.12.3-18; City of Roseville 2016:4.12-13; Placer County 2008a:2-26; RMC Water and Environment 2009:ES-4, ES-14, 3-5 and 3-6

Consistent with the text correction shown in Table 4.15-14, above, the text on page 4.15-67 of the Draft EIR is revised as follows:

> Cumulative projects that would contribute demand for wastewater treatment at the PGWWTP include rezones and intensification within the regional service area boundary (including the West Roseville Specific Plan), Curry Creek Specific Plan, Regional University, Inviro Tech, Orchard Creek, Creekview Specific Plan, Sierra Vista Specific Plan, and Amoruso Specific Plan. Estimated buildout flows within the regional service boundary and the ultimate service area boundary are shown in Table 4.15-14. The Systems Evaluation for SPWA completed in 2009 assessed flows from these developments to plan for future wastewater treatment service needs. Table 4.15-14 is based on the flows assessed in the Systems Evaluation; however, revised flow estimates are provided where they have been updated. Excluding flows from the net SAP and PRSP areas, buildout ADWF for the SPWA regional service area boundary and ultimate service area boundary is estimated to be 21.96 mgd. The ADWF for buildout of the regional service area boundary and ultimate service area boundary including flows from the net SAP and PRSP areas is estimated to be ~~27.73~~ 27.75 mgd.

To provide a correction, the impact summary for Impact 4.15-7 on page 4.15-57 of the Draft EIR is revised as follows:

Impact 4.15-7: Increased demand for electricity

Implementation of the SAP, including the PRSP, would increase demand for electricity by bringing new residential and non-residential electricity users to the area. The increased demand for electricity could require additional electricity generation and transmission facilities, as well as the need for distribution infrastructure. PG&E has existing and planned substations in the SAP area that would have sufficient capacity to serve the new development in the net SAP and PRSP areas. Distribution infrastructure would be installed concurrently with net SAP and PRSP development, thereby reducing potential environmental impacts. Pioneer Community Energy recognizes the additional electric generation service needed to service the increased demand. The impact would be **less than significant**.

To provide a correction, the following new text is added to page 4.15-58 of the Draft EIR immediately preceding the section "Other Supporting Infrastructure":

Pioneer Community Energy expects to increase its supply portfolio to meet the increased demand for electric generation service. The increase in the electric generation supply portfolio will be incrementally adjusted commensurate with increased demand. The impact would be less than significant.

To provide a correction, the conclusion paragraph on page 4.15-59 of the Draft EIR is revised as follows:

Conclusion
While buildout of the net SAP area and PRSP area would generate demand for electricity, PG&E's existing and planned facilities would have capacity to serve development, and Pioneer Community Energy has the ability to accommodate additional demand for electric generation service. Backbone infrastructure and distribution systems would also be required for new development and would be installed concurrently with new development. Because existing and planned capacity and infrastructure would be adequate to serve buildout of the net SAP area and PRSP area, this impact would be **less than significant**.

To reflect the new mitigation measures added in Section 4.3, "Air Quality," to reduce objectionable odors and to also make it clear that waste diversion requirements would be speculative, the second paragraph on page 4.15-64 of the Draft EIR is revised as follows:

As discussed in more detail in Section 4.10, "Land Use" (see Impact 4.10-2, "Consistency and compatibility with the Western Regional Sanitary Landfill), odor complaints related to land use inconsistency do not necessarily preclude landfill expansion. For example, although some operations of the Newby Island Recovery Park could be curtailed as part of a settlement agreement, the facility was still able to obtain a permit to expand. Additionally, despite odor complaints (many of which were eventually determined not to originate at the landfill), Chiquita Canyon Landfill was still allowed to expand. Of the landfills discussed, organic waste diversion was required for Sunshine Canyon Landfill. At Newby Island Recovery Park, the settlement agreement required either stopping of composting or reducing its odor. Therefore, diversion of waste would not necessarily occur as a result of increased odor complaints. Furthermore, the effects of odor complaints on operations varies among facilities. In summary, any of the following may or may not be implemented at the WRSL, based on the survey of other facilities described in Impact 4.10-2:

- prohibiting large trash deliveries during certain hours,
- diverting organic food waste,
- improving the cover to control landfill gas emissions,
- improving gas collection and well efficiency and integrity,

- paying substantially affected households,
- stopping green waste composting or reducing odors from it,
- avoiding turning greenery and compost on weekends, and
- using sprinklers for dust control.

Determining what measures would or would not be implemented at the WRSL would be speculative. Therefore, based on existing and future operations at WRSL, and research into other similar facilities around the state, potential impacts on the WRSL and on waste disposal service would be **less than significant**.

To provide a correction, Cumulative Impact 4.15-18 on page 4.15-70 of the Draft EIR is revised as follows:

Cumulative Impact 4.15-18: Cumulative increase in demand for electricity

As discussed in Impact 4.15-7, PG&E has adequate capacity and infrastructure to serve the electricity demands of development in the net SAP and PRSP areas, as well as other development in the area. Population increases associated with the more than 100,000 new residential units resulting from cumulative projects would be relatively slow, allowing for PG&E to construct additional infrastructure as necessary to meet demand. As electric generation service provider, Pioneer Community Energy has adequate supply to serve the electric generation demands of development in the net SAP and PRSP areas, as well as other development in the area. As part of the approval process for individual projects, project proponents would be required to provide proof from PG&E and Pioneer Community Energy that the development would be served by the ~~utility~~ utilities. With compliance with County requirements for obtaining will-serve letters, development in the net SAP and PRSP areas would not result in a considerable contribution to a cumulative impact related to increased demand for electricity. The impact would be **less than significant**.

2.1.20 Revisions to Section 4.16, "Energy"

To provide a correction, the first three paragraphs on page 4.16-2 of the Draft EIR are revised as follows:

Energy Service in the SAP Area

Electric transmission and delivery service and natural gas services in Placer County are provided by Pacific Gas and Electric Company (PG&E). Electric generation and related services in Placer County are provided by Pioneer Community Energy. PG&E would provide the project area, with electric transmission and delivery service and natural gas service. Pioneer Community Energy would provide the project area with electric generation and related service. Information regarding existing electric and natural gas facilities in the project area is provided in Section 4.15, "Utilities."

Energy Types and Sources

California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources. One-third of energy commodities consumed in California is natural gas. In 2014, approximately 35 percent of natural gas consumed in the state was used to generate electricity. Residential land uses represented approximately 17 percent of California's natural gas consumption with the balance consumed by the industrial, resource extraction, and commercial sectors (EIA 2014).

Power plants in California meet approximately 68 percent of the in-state electricity demand, hydroelectric power from the Pacific Northwest provides another 12 percent, and power plants in the southwestern U. S. provide another 20 percent (EIA 2014). The contribution of in- and out-of-state power plants depends on the precipitation that occurred in the previous year, the corresponding amount of hydroelectric power that is available, and other factors. ~~PG&E~~ Pioneer Community Energy is the primary electricity supplier in Placer County. As of December 31, 2018, Pioneer Community Energy's power supply content was 33

percent renewable, including biomass and biowaste, geothermal, eligible hydroelectric, solar and wind. ~~As of 2015, PG&E was powered by 29.5 percent renewables, including biomass, geothermal, small hydroelectric, solar, and wind (CPUC 2017).~~

To provide a correction, the section "Alternative Fuels" on page 4.16-2 of the Draft EIR is revised as follows:

Alternative Transportation Fuels

On-road vehicles use about 90 percent of the petroleum consumed in California. Caltrans projected that 237 million gallons of gasoline and diesel were consumed in Placer County in 2015, which represents an increase of approximately 26 million gallons of fuel from 2010 levels, following a general trend of approximately a 2 percent increase in fuel consumption per year (Caltrans 2008).

To provide a correction, the section "Energy Use for Transportation" on page 4.16-3 of the Draft EIR is revised as follows:

~~ENERGY USE FOR TRANSPORTATION~~

~~On-road vehicles use about 90 percent of the petroleum consumed in California. Caltrans projected that 237 million gallons of gasoline and diesel were consumed in Placer County in 2015, which represents an increase of approximately 26 million gallons of fuel from 2010 levels, following a general trend of approximately a 2 percent increase in fuel consumption per year (Caltrans 2008).~~

To provide a correction, the section "State of California Energy Plan" on page 4.16-4 of the Draft EIR is revised as follows:

State of California Energy Plan

CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the 1997 California Energy Plan. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies strategies such as aiding public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, and encouraging urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access.

The California Public Utilities Commission (CPUC) is responsible for implementing, overseeing and regulating compliance with certain statewide energy goals and policies, including the state's integrated resource plan (IRP) and the renewable portfolio standard (RPS).

To provide a correction, the following new text is added to page 4.16-5 of the Draft EIR immediately following the section entitled "Senate Bill 350…" and preceding the section entitled "Assembly Bill 1007…":

Senate Bill 100: The 100 Percent Clean Energy Act of 2018

In 2018, SB 100 was passed into law which accelerated and increased the RPS requirements specified in SB 350. As a result, load serving entities, including community choice aggregators, must increase their RPS requirement to 50 percent by the end of 2026, 60 percent by the end of 2030. Pioneer Community Energy is subject to both SB 350 and SB 100.

To provide a correction, the following new text is added to page 4.16-8 of the Draft EIR immediately preceding Section 4.16.4, "Analysis, Impacts, and Mitigation":

Pioneer Community Energy

Placer County is a member entity of Pioneer Community Energy. As a community choice aggregator, Pioneer Community Energy is required to comply with SB 350, 100, 1078, and 32 and other related legislative and regulatory requirements. Pioneer Community Energy has an IRP and maintains an energy supply portfolio in compliance with RPS requirements.

To provide a revision to SAP Policy NR-6.7, the seventh bullet on page 4.16-11 of the Draft EIR is revised as follows:

- **Policy NR-6.7: Residential Energy Efficiency.** The County shall require ~~encourage~~ new residential units to be designed and constructed to maximize energy efficiency. This ~~should~~ shall include ~~consideration of~~ the following design features:

  a) Installation of solar photovoltaic systems ~~Pre-plumbing and structural design to accommodate solar energy systems~~.

  b) Installation of energy conservation appliances such as tankless water heaters and whole house fans in all residential units.

  c) Installation of energy efficient AC units and heating system with programmable thermostat timers, to the extent feasible.

  d) Use of low flow water fixtures such as low flow toilets and faucets, to the extent feasible.

To provide a correction, Cumulative Impact 4.16-3 on page 4.16-22 of the Draft EIR is revised as follows:

Cumulative Impact 4.16-3: Cumulative wasteful and inefficient consumption of energy

Several other currently planned and approved projects identified in Table 4.0-2 would also receive electricity and natural gas service provided by PG&E and Pioneer Community Energy. These projects would also consume energy related to transportation and construction. These projects would be required to implement energy-efficiency measures in accordance with Title 24 to reduce energy demand. Given the large amount of development identified in the region, it is possible that even with implementation of Title 24 measures, inefficient and wasteful energy consumption could occur.

2.1.21 Revisions to Chapter 5, "Other CEQA-Mandated Sections"

To provide a minor correction to the list of significant and unavoidable impacts to reflect the correct impact conclusion for Impact 4.1-2 (which is correctly identified in Section 4.1, "Aesthetics," of the Draft EIR), the bulleted list that begins on page 5-1 of the Draft EIR is revised as follows:

Aesthetics

- Impact 4.1-2: Substantial degradation of the existing visual character or quality of the site and its surroundings after buildout

- Impact 4.1-3: New source of substantial light or glare that would adversely affect daytime or nighttime views in the area during construction

2.1.22 Revisions to Chapter 6, "Project Alternatives"

In response to comment 31-10 as well as a result of further meetings with CSU, the following minor revisions to the Draft EIR are provided to increase clarity. Table 6-1 on pages 6-4 and 6-5 of the Draft EIR is revised as follows:

Table 6-1 Project Development at Buildout

Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Single-Family Residential[1]	3,082 du	~~2,460~~ 0 du	~~5,542~~ 3,082 du
Age-Restricted Residential	1,050 du	0 du	1,050 du
Multifamily Residential[2]	1,504 du	~~0~~ 2,458 du	~~1,504~~ 3,962 du
Retail[3]	1,640 ksf	220 ksf	1,860 ksf
Office[4]	1,241 ksf	1,110 ksf	2,351 ksf
Industrial[5]	1,658 ksf	11,440 ksf	13,098 ksf
Innovation Center/R&D[6]	901 ksf	12,000 ksf	12,901 ksf
Entertainment Mixed Use	0 ksf	3,060 ksf	3,060 ksf
University	30,000 students	0 students	30,000 students
Public Facilities	10.3 ac	6.3 ac	16.6 ac
Parks/Open Space	69.8 ac	0.0 ac	69.8 ac
Preserve/Mitigation Areas[7]	264.8 ac	2,263.8 ac	2,528.6 ac

Notes: ac = acres; du = dwelling units; ksf = 1,000 square feet; R&D = research and development.

[1] All medium-density residential uses are assumed to be single-family (rather than multifamily) residential.

[2] All high-density residential uses are assumed to be multifamily residential.

[3] All commercial uses (General Commercial, commercial components of Commercial Mixed Use and Campus Park) assume a highest trip-generating condition of 100% retail space.

[4] Office uses include office components of Commercial Mixed Use and Campus Park in the PRSP area and Business Park in the remainder of the SAP area.

[5] Industrial uses include light industrial and warehouse components of Campus Park in the PRSP area and light industrial and eco-industrial land uses in the remainder of the SAP area.

[6] Innovation Center/Research & Development include the Research & Development component of Campus Park in the PRSP area and Innovation Center in remainder of the SAP area.

[7] Does not include open space acreage within Sac State–Placer Center site.

Source: Information provided by MacKay & Somps and Mintier Harnish and compiled by Ascent Environmental in 2018

As shown above, the County revised the proposed amendment to the General Plan landfill buffer policy to eliminate the newly proposed allowance of residential uses within 1,000 feet of the landfill with approval of a specific plan, master plan, or development agreement and replace it with a requirement that all new residential development proposed between 1 mile and 2,000 feet of any solid waste disposal site property boundaries requires approval of a specific plan, master plan, or development agreement. To reflect this change, page 6-6 of the Draft EIR is revised as follows:

- **Land Use**: The proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the WRSL from 1 mile (5,280 feet) to 2,000 feet for residential development~~, or 1,000 feet~~ with the approval of a specific plan, master plan, or development agreement. This proposed General Plan amendment could result in land use incompatibility due to residential development occurring closer to the WRSL in areas that would otherwise remain undeveloped under the current residential buffer policy. Based on review of existing data regarding nuisance complaints from residents beyond 1 mile, it is expected that

new residents and users within the project area would complain about odor from the WRSL and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL and, absent measures to control odors at the source and/or at receptors, could interfere with the ability of the landfill to expand or modify needed operations. As described in detail in Section 4.3, "Air Quality," measures available to Placer County to mitigate odor impacts would be infeasible, but feasible measures are available to WPWMA including revised composting methods, minimizing use of fines as alternative daily cover, and appropriate and timely handling of sludge waste. Mitigation Measure 4.10-2 would require implementation of measures in new development pursuant to proposed specific plans, master plans, or development agreements that would reduce perception of odor inside new structures and, to a lesser extent, outside new structures. However, this measure would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Therefore, this impact would be **significant.**

To provide clarification regarding Alternative 2 (Reduced Scale), the fourth paragraph on page 6-16 of the Draft EIR is revised as follows:

Aesthetics

The Reduced Scale Alternative would limit building height to 60 feet and would require softer transition between existing preserve/mitigation land and urban development by requiring single-story structures and additional buffers adjacent to the preserve/mitigation land, which would substantially reduce this significant impact. The alternative would otherwise include similar design guidelines to those included with the SAP and PRSP and that policies similar to those included in the SAP would apply. However, even with lower-scale development, softer transition between existing preserve/mitigation land, and implementation of policies and design guidelines, the substantial change in visual character of the urban development contrasted against the undeveloped preserve/mitigation land would still constitute a substantial adverse change in visual quality. Therefore, although the impact under the alternative would be **less** than the project's impact as a result of the reduced building height allowance and the softer transitions, the impact would still be significant.

To provide clarification regarding Alternative 3 (Reduced Footprint, Reduced Development Potential), the last paragraph on page 6-19 and continuing to page 6-20 of the Draft EIR is revised as follows:

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Reduced Development Potential Alternative would result in fewer acres of developed land, and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent, which would be a substantial reduction of this significant impact. The U.S. Fish and Wildlife Service (USFWS) preservation target for vernal pool recovery core areas is 85 percent, so the increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Reduced Development Potential Alternative would be **less** compared to those resulting from the project.

To provide clarification regarding Alternative 4 (Reduced Footprint, Similar Development Potential), the third paragraph on page 6-24 of the Draft EIR is revised as follows:

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Similar Development Potential Alternative would result in fewer acres of developed land and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent, which would be a substantial reduction of this significant impact. The USFWS preservation target for vernal pool recovery core areas is 85 percent, so the increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Similar Development Potential Alternative would be **less** compared to those resulting from the project.

To provide clarification regarding Alternative 5 (Reduced VMT), the first paragraph on page 6-25 of the Draft EIR is revised as follows:

Section 4.14, "Transportation and Circulation," of this Draft EIR identifies significant project impacts related to VMT. Although project buildout would result in a lower VMT per capita than the existing VMT per capita generated by existing development in the project area, the project-generated VMT per capita levels would, even after implementing traffic demand management (TDM) strategies, continue to remain above the SACOG regional total VMT per capita. One of the reasons for the high level of VMT associated with the project is that the SAP EMU designation allows uses that could generate significant numbers of vehicle trips originating outside the region, such as entertainment venues and super-regional destination retail (among other uses). Large numbers of trips from vehicle traveling long distances increases VMT per capita. This alternative is designed to reduce project VMT. It should be noted that, although this alternative was designed to address increased VMT, it would also likely result in reduced GHG emission, which is also a significant impact associated with project implementation. This alternative appears to meet most of the project objectives described above.

To provide clarification regarding Alternative 5 (Reduced VMT), the last paragraph on page 6-27 of the Draft EIR is revised as follows:

Transportation and Circulation

The project results in significant traffic impacts to a substantial number of roadway and transportation facilities across several jurisdictions. Implementation of the Reduced VMT Alternative would reduce the nonresidential development by 20 percent compared to the project. This reduction would translate into substantially less trip generation; however, considering that the alternative still results in the development of over 6,000 residential units and over 10 million sq. ft. of nonresidential development (not including the Sac State–Placer Center), the alternative would still result in substantial increase in traffic on the local roadway network compared to current conditions. It is likely that the alternative would result in impacts to fewer transportation facilities and that the impacts would be less severe; however, significant impacts would be likely even with implementation of similar mitigation measures. Also, because the Reduced VMT Alternative does not include non-residential development in the SAP's EMU, including regional- and super-regional-serving uses, the VMT would be reduced by 25 percent. Although this is a considerable reduction compared to project VMT, the VMT would still remain above the SACOG regional total VMT per capita. Overall, the No-Project Alternative would result in less impact than the project with respect to transportation and circulation, but there would still be significant impacts.

To provide clarification regarding the alternatives analysis, the third paragraph on page 6-28 of the Draft EIR is revised as follows:

> State CEQA Guidelines Section 15126.6(e)(2) states that when the no-project alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. As discussed above and shown below in Table 6-7, all of the other alternatives result in an overall level of impact that is less than the proposed project, although none of the other alternatives completely avoid ~~or substantially reduce~~ any of the significant impacts of the project. Among these remaining alternatives, Alternative 3 is considered environmentally superior because it results in the greatest reduction of significant impacts, and it appears to meet most of the project objectives.

2.1.23 Revisions to Chapter 7, "List of Preparers"

No revisions are needed.

2.1.24 Revisions to Chapter 8, "References"

The following new references are added to Chapter 8, "References," under the subheading, Section 4.3, "Air Quality," of the Draft EIR as follows:

Baral, Robin R. Churchwell White, LLP, Sacramento, CA. August 22, 2019—memorandum to Clayton Cook of the Office of Placer County Counsel regarding Odor Mitigation for the Sunset Area Plan/Placer Ranch Specific Plan EIR (State Clearinghouse No. 2016112012). Sent on behalf of the Western Placer Waste Management Authority.

Placer County Air Pollution Control District. 2016 (October). *California Environmental Quality Act Thresholds of Significance. Justification Report.* Available: http://www.placerair.org/landuseandceqa/ceqathresholdsandreviewprinciples. Accessed August 2019.

Schmidt, CE and TR Card. 2019 (August 2). Technical Report #2: Odor Mitigation Measures Related to Proposed Development within the WRSL Buffer Zone. Letter memorandum to Robin Baral of Churchwell White, LLP. Red Bluff, CA.

2.1.25 Revisions to Appendices

The Draft EIR included as Appendix H the May 2017 versions of the Placer Ranch utilities master plans (i.e., Potable Water Master Plan, Recycled Water Master Plan, Sewer System Master Plan, Storm Drainage Master Plan, and Dry Utilities Plan). The current versions of these plans are dated July 2017. The July 2017 versions are included as Appendix A through F to this Final EIR. The changes between the May 2017 versions and the July 2017 versions are very minor. Also, the Draft EIR included as Appendix P several technical memoranda that provided updates to the Placer Ranch utilities master plans. Each technical memorandum included in Appendix P corresponds to one of the Placer Ranch utilities master plans. The Draft EIR relied on the updated data from these technical memoranda; however, this confused some commenters who pointed out that the Draft EIR data was not consistent with the data presented in the utilities master plans. To provide clarity, each of the technical memoranda is included with its corresponding utilities master plan in Appendices A through F.

Appendix K of the Draft EIR did not include the detailed calculations for the Off-Site Mitigation Fee Program that are discussed in Mitigation Measure 4.7-2b. These calculations are provided in the Final EIR as Appendix H.

3 RESPONSES TO COMMENTS ON THE DRAFT EIR

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on February 19, 2019, including transcribed comments received during the February 14, 2019, public hearing. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

Table 1-1 in Chapter 1, "Introduction," presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

A public hearing to receive comments on the Draft EIR was held on February 14, 2019. The hearing was held during the regular meeting of the Placer County Planning Commission at 10:05 a.m. The hearing was recorded, and a transcript was prepared.

The verbal and written individual comments received on the Draft EIR and the responses to those comments are provided in Section 3.2, "Comments and Responses." The comment letters and verbal comments made at the public hearing are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

3.1 MASTER RESPONSES

Several comments raised similar issues. Rather than responding individually, master responses have been developed to address the comments comprehensively. Master response topics are listed below, and the detailed master responses are provided in Sections 3.1.1 through 3.1.9. A reference to the master response is provided, where relevant, in responses to individual comments (see Section 3.2, "Comments and Responses."

- Master Response 1: Alternatives Analysis
- Master Response 2: Citizen-Initiated Smart Growth Alternative
- Master Response 3: Placer County Conservation Program and Mitigation
- Master Response 4: Odors
- Master Response 5: Greenhouse Gas Mitigation
- Master Response 6: Drainage and Flooding
- Master Response 7: Program- vs. Project-Level Analysis
- Master Response 8: Recirculation
- Master Response 9: Mitigation and Development Fees

3.1.1 Master Response 1: Alternatives Analysis

Numerous comments addressed the Draft EIR alternatives analysis, with several comments focusing on the Citizen-Initiated Smart Growth Plan (CISGP) Alternative and suggesting it should be studied further in the Draft EIR or approved instead of the proposed project. This master response focuses on the adequacy of the alternatives analysis, in general. For a discussion of the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan.

ADEQUACY OF ALTERNATIVES ANALYSIS

CEQA and the State CEQA Guidelines identify the requirements for the analysis of project alternatives in the EIR. State CEQA Guidelines Section 15126.6 generally addresses the requirements for an alternatives analysis in an EIR:

- An EIR shall describe a reasonable range of potentially feasible alternatives to the project or the location of the project that would attain most of the basic project objectives and would avoid or substantially lessen any of the significant effects of the project.
- There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
- The EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons for the lead agency's determination.
- The EIR shall include enough information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.
- The no project alternative should be evaluated along with its impacts. The purpose for describing the no project alternative is so decision makers can compare impacts of approving the proposed project with impacts of not approving the proposed project.
- The no project alternative for a project that revises an existing land use plan is the continuation of the existing plan.
- If it is found that the no project alternative is the environmentally superior alternative, then the EIR should identify an environmentally superior alternative among the other alternatives.

Screening of individual alternatives for consideration in an EIR involves evaluating each alternative for three elements under CEQA:

1. **Accomplishment of most of the basic project objectives:** Alternatives must accomplish most of the basic objectives of the project (State CEQA Guidelines Section 15126.6[c]). CEQA compels consideration of an alternative even if it "would impede to some degree the attainment of the project objectives" (Section 15126.6[b]).
2. **Potential feasibility:** An EIR must consider potentially feasible alternatives (Section 15126.6[a]). Section 15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."
3. **Potential to avoid or substantially reduce a significant environmental effect of the proposed project:** An alternative must "avoid or substantially lessen any of the significant effects of the project" (Section 15126.6[a]).

An alternative that does not satisfy all three CEQA requirements would be dismissed from further evaluation in an EIR.

As described in detail below, the Draft EIR's evaluation of alternatives meets the CEQA requirements because it provides a reasonable range of feasible alternatives designed specifically to substantially reduce significant impacts associated with the proposed project, and it identifies the environmentally superior alternative.

ALTERNATIVES ANALYSIS

Draft EIR page 6-7 describes an off-site alternative that was considered but dismissed as infeasible because it does not meet certain critical location-related objectives. The Draft EIR carries four alternatives forward for full evaluation. Each alternative has a different land use configuration. The Draft EIR evaluates these

alternatives as to whether they also meet most of the project objectives and reduce or substantially avoid a significant impact of the proposed project:

- **Alternative 2: Reduced Scale.** This alternative includes reduced building heights to smooth the transition between developed and undeveloped areas compared to the proposed project. As explained in the Draft EIR at pages 6-15 through 6-16, Alternative 2 would reduce impacts on aesthetics and appears to meet most of the project objectives. This alternative would substantially reduce significant impacts related to the abrupt transition between development and undeveloped land; the Draft EIR has been revised on page 6-16 to clarify this conclusion.
- **Alternative 3: Reduced Footprint, Reduced Development Potential.** This alternative includes a reduced footprint and overall reduction in development potential compared to the proposed project. As explained in the Draft EIR at pages 6-16 through 6-21, Alternative 3 would reduce impacts on aesthetics; air quality; biological resources; greenhouse gases; population, employment, and housing; and transportation and circulation. The alternative appears to meet most of the project objectives. This alternative would substantially reduce significant impacts on vernal pool habitat; the Draft EIR has been clarified on page 6-19 to reflect this conclusion.
- **Alternative 4: Reduced Footprint, Smaller Development Potential.** This alternative includes similar overall development potential but on a reduced footprint compared to the proposed project. As explained in the Draft EIR at pages 6-21 through 6-24, Alternative 4 would reduce impacts on air quality and biological resources. The alternative appears to meet most of the project objectives. This alternative would substantially reduce significant impacts on vernal pool habitat; the Draft EIR has been clarified on page 6-24 to reflect this conclusion.
- **Alternative 5: Reduced VMT.** This alternative includes a suite of allowable land uses that would reduce vehicle miles traveled (VMT) compared to the proposed project. As explained in the Draft EIR at pages 6-25 through 6-27, Alternative 5 would reduce impacts on aesthetics; air quality; greenhouse gases; population, employment, and housing; and transportation and circulation. The alternative appears to meet most of the project objectives; as described later in this response, the Draft EIR has been clarified on page 6-25 to reflect this conclusion. This alternative would result in a substantial reduction in VMT; the Draft EIR has been clarified on page 6-27 to reflect this conclusion.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Draft EIR page 6-28 contains the evaluation of the environmentally superior alternative. The No-Project Alternative is environmentally superior; however, when the No-Project Alternative has been identified as the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that the environmentally superior alternative from among the remaining alternatives be identified. Therefore, the Draft EIR concludes that Alternative 3 is environmentally superior. Chapter 6 of the Draft EIR has been clarified to reflect the conclusions about each alternative substantially reducing a significant impact of the proposed project. These changes are identified below under "Revisions to the Draft EIR" as well as in Chapter 2, "Revisions to the Draft EIR."

REASONABLE RANGE

The Draft EIR evaluated a reasonable range of alternatives. The Draft EIR evaluates four alternatives (and the No Project Alternative), which aim to reduce significant impacts of the proposed project while meeting most of the basic objectives of the project. CEQA does not specify how many alternatives constitute a "range of reasonable alternatives," but provides the following guidance:

> "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project." (Guidelines Section 15126.6[f])

The discussion of alternatives is subject to a "rule of reason" (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* [1988] 47 Cal.3d 376, 406-407; *Citizens of Goleta Valley v. Board of Supervisors* [1990] 52 Cal.3d 553, 565-566). "'There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.' (CEQA Guidelines Section 15126.6(a)). 'The agency's discretion to choose alternatives for study will be upheld as long as there is a reasonable basis for the choices it has made.'" (1 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act [Cont.Ed.Bar 2d ed. 2012] Project Alternatives Section 15:11, page 743 (rev. 3/12)) (*City of Maywood v. Los Angeles Unified School Dist.* [2012] 208 Cal.App.4th 362, 420-421). "The rule of reason 'requires the EIR to set forth only those alternatives necessary to permit a reasoned choice' and to 'examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.' (CEQA Guidelines Section 15126.6(f)) An EIR does not have to consider alternatives 'whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.' (CEQA Guidelines Section 15126.6(f)(3))" (*In re Bay-Delta Programmatic Environmental Impact Report* (2008) 43 Cal.4th 1143, 1163-1164).

The Draft EIR "permits a reasoned choice" by evaluating a range of alternatives each aimed at reducing significant impacts to key resources. Because the alternatives are designed to reduce specific environmental impacts, each alternative considered in the Draft EIR is substantially different from the others. Some include a slight modification to the project to avoid a specific impact, others seek to reduce a specific impact by drastically reducing development capacity in a major land use category, and others include complete redesign to reduce the development footprint and reduce multiple environmental impacts. The Draft EIR did not consider alternatives (other than the No Project Alternative) that could not feasibly attain most of the basic project objectives.

CONSIDERATION OF ALTERNATIVES BY PLACER COUNTY BOARD OF SUPERVISORS

When the Placer County Board of Supervisors considers whether to certify the EIR, the Board will also determine whether to approve the proposed project or an alternative that is feasible, avoids or substantially lessens any of the significant adverse effects of the project, and meets most of the basic project objectives. Feasibility of an alternative is considered twice in the CEQA process. As indicated previously, an EIR must consider the potential feasibility of alternatives, in addition to whether they meet most of the basic project objectives and avoid or substantially reduce a significant impact of the proposed project. The Board will also consider feasibility of alternatives when considering whether to approve the project. The Board can consider a variety of factors, such as economic, legal, social, and technological factors, when determining whether to reject alternatives in favor of the proposed project (see State CEQA Guidelines Section 15091[a][3]). If the Board finds an alternative considered potentially feasible in the EIR to be infeasible at the decision-making phase, that finding does not indicate the EIR should not have considered the alternative. For example, the Board can consider all comments received on the Draft EIR, as well as other material in the record when making its final determination about the proposed project. And the determination of feasibility inevitably requires exercise of judgment by the decision-making body regarding the factors to be considered when determining whether an alternative is feasible.

REVISIONS TO THE DRAFT EIR

For further clarity, the following revisions have been made to the Draft EIR alternatives analysis.

To provide clarification regarding Alternative 2 (Reduced Scale), the fourth paragraph on page 6-16 of the Draft EIR is revised as follows:

Aesthetics

The Reduced Scale Alternative would limit building height to 60 feet and would require softer transition between existing preserve/mitigation land and urban development by requiring single-story structures and additional buffers adjacent to the preserve/mitigation land, which would substantially reduce this significant impact. The alternative would otherwise include similar design guidelines to those included with the SAP and PRSP and that policies similar to those included in the SAP would apply. However,

even with lower-scale development, softer transition between existing preserve/mitigation land, and implementation of policies and design guidelines, the substantial change in visual character of the urban development contrasted against the undeveloped preserve/mitigation land would still constitute a substantial adverse change in visual quality. Therefore, although the impact under the alternative would be **less** than the project's impact as a result of the reduced building height allowance and the softer transitions, the impact would still be significant.

To provide clarification regarding Alternative 3 (Reduced Footprint, Reduced Development Potential), the last paragraph on page 6-19 and continuing to page 6-20 of the Draft EIR is revised as follows:

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Reduced Development Potential Alternative would result in fewer acres of developed land, and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent, which would be a substantial reduction of this significant impact. The U.S. Fish and Wildlife Service (USFWS) preservation target for vernal pool recovery core areas is 85 percent, so the increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Reduced Development Potential Alternative would be **less** compared to those resulting from the project.

To provide clarification regarding Alternative 4 (Reduced Footprint, Similar Development Potential), the third paragraph on page 6-24 of the Draft EIR is revised as follows:

Biological Resources

Implementation of the project would result in significant impacts related to permanent loss of habitat for special-status-species and other sensitive habitat. Implementation of the Reduced Footprint, Similar Development Potential Alternative would result in fewer acres of developed land and would increase preservation of core vernal pool habitat from 29 percent under the project to 49 percent, which would be a substantial reduction of this significant impact. The USFWS preservation target for vernal pool recovery core areas is 85 percent, so the increased preservation under the alternative would still fall short of the target, and the impact would remain significant. However, this alternative demonstrates a serious effort to minimize the impact to the extent feasible. Implementation of the alternative would also involve less construction than the project (because of the smaller development footprint) and would therefore result in slightly less likelihood that special-status species could be affected during construction. Mitigation measures needed for the alternative would be similar to those needed for the project. Overall, the impacts of the Reduced Footprint, Similar Development Potential Alternative would be **less** compared to those resulting from the project.

To provide clarification regarding Alternative 5 (Reduced VMT), the first paragraph on page 6-25 of the Draft EIR is revised as follows:

Section 4.14, "Transportation and Circulation," of this Draft EIR identifies significant project impacts related to VMT. Although project buildout would result in a lower VMT per capita than the existing VMT per capita generated by existing development in the project area, the project-generated VMT per capita levels would, even after implementing traffic demand management (TDM) strategies, continue to remain above the SACOG regional total VMT per capita. One of the reasons for the high level of VMT associated with the project is that the SAP EMU designation allows uses that could generate significant numbers of vehicle trips originating outside the region, such as entertainment venues and

super-regional destination retail (among other uses). Large numbers of trips from vehicle traveling long distances increases VMT per capita. This alternative is designed to reduce project VMT. It should be noted that, although this alternative was designed to address increased VMT, it would also likely result in reduced GHG emission, which is also a significant impact associated with project implementation. This alternative appears to meet most of the project objectives described above.

To provide clarification regarding Alternative 5 (Reduced VMT), the last paragraph on page 6-27 of the Draft EIR is revised as follows:

Transportation and Circulation

The project results in significant traffic impacts to a substantial number of roadway and transportation facilities across several jurisdictions. Implementation of the Reduced VMT Alternative would reduce the nonresidential development by 20 percent compared to the project. This reduction would translate into substantially less trip generation; however, considering that the alternative still results in the development of over 6,000 residential units and over 10 million sq. ft. of nonresidential development (not including the Sac State–Placer Center), the alternative would still result in substantial increase in traffic on the local roadway network compared to current conditions. It is likely that the alternative would result in impacts to fewer transportation facilities and that the impacts would be less severe; however, significant impacts would be likely even with implementation of similar mitigation measures. Also, because the Reduced VMT Alternative does not include non-residential development in the SAP's EMU, including regional- and super-regional-serving uses, the VMT would be reduced by 25 percent. Although this is a considerable reduction compared to project VMT, the VMT would still remain above the SACOG regional total VMT per capita. Overall, the No-Project Alternative would result in less impact than the project with respect to transportation and circulation, but there would still be significant impacts.

To provide clarification regarding the alternatives analysis, the third paragraph on page 6-28 of the Draft EIR is revised as follows:

State CEQA Guidelines Section 15126.6(e)(2) states that when the no-project alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. As discussed above and shown below in Table 6-7, all of the other alternatives result in an overall level of impact that is less than the proposed project, although none of the other alternatives completely avoid ~~or substantially reduce~~ any of the significant impacts of the project. Among these remaining alternatives, Alternative 3 is considered environmentally superior because it results in the greatest reduction of significant impacts, and it appears to meet most of the project objectives.

3.1.2 Master Response 2: Citizen-Initiated Smart Growth Plan

Master Response 1: Alternatives Analysis addresses the CEQA requirements for an analysis of project alternatives and explains how the Draft EIR meets those requirements. In sum, the Draft EIR meets the CEQA requirements because it provides a reasonable range of feasible alternatives designed specifically to substantially reduce significant impacts associated with the proposed project, and it identifies the environmentally superior alternative. See Master Response 1: Alternatives Analysis for more detail.

However, one of the primary purposes of CEQA is to allow the public to provide input on the environmental analysis, including, importantly, suggestions for other avenues or more effective methods to reduce significant impacts through mitigation measures and alternatives. Specifically, California Code of Regulations (CCR) Section 15204 states that comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. CEQA, in fact, classifies a new feasible alternative or mitigation measure as "significant new information" that would require recirculation of the Draft EIR if the new (feasible)

alternative or mitigation measure is considerably different from the others previously analyzed in the Draft EIR, it would clearly lessen the project's environmental impacts, and the project proponent declines to adopt it. Therefore, a new alternative or mitigation measure suggested during the public review period requires thorough review and thoughtful consideration to determine whether the alternative is feasible and whether the Draft EIR should be recirculated to include it.

CITIZEN-INITIATED SMART GROWTH PLAN

During the public review period a suggested alternative to the project was submitted by the Alliance for Environmental Leadership (AEL). The alternative, called the Citizen-Initiated Smart Growth Plan (CISGP), is a comprehensive, thoughtfully prepared plan, which attempts to achieve, among other objectives, reduction of significant environmental impacts associated with the proposed project. As stated in the CISGP, the plan's purpose is to put forward a climate-resilient, low-carbon alternative to urban sprawl for the SAP update to the General Plan. The CISGP's objectives include providing diverse opportunities for industrial innovation, providing mixed-use compact development, providing housing choice, providing high-quality design and amenities, enhancing existing assets, maintaining natural resource value, retaining unique land supply, providing protection from incompatible land uses, providing education and outreach, and monitoring. The CISGP uses the existing Sunset Industrial Area (SIA) Plan boundary, so the CISGP area is more than 300 acres smaller than the proposed project area. Also, importantly, the CISGP does not include a specific plan alternative to the PRSP, although it does apply land use designations in the PRSP area.

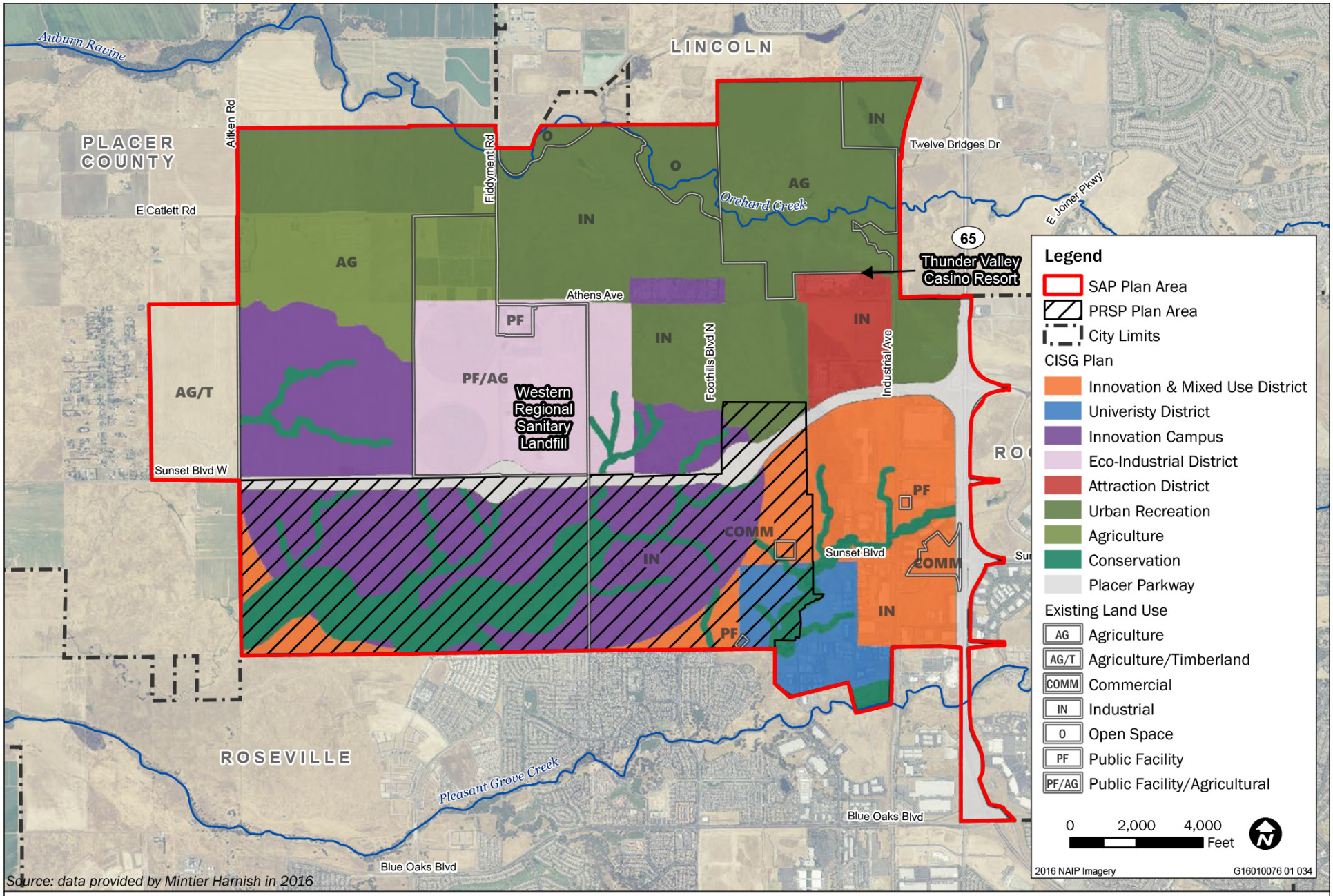
The CISGP appears to employ three primary strategies for reducing environmental impacts, which can be summarized as follows:

- decreasing the overall area identified for urban development to provide greater avoidance of on-site natural resources, including biological, cultural, and agricultural resources;
- maintaining the existing landfill buffer by excluding all residential and other sensitive land uses within 1 mile of the landfill; and
- increasing the level of urban development and adjusting the jobs/housing mix to increase per-capita energy and transportation efficiency, thereby attempting to reduce project-related significant impacts associated with air pollutant and greenhouse gas (GHG) emissions, as well as impacts related to VMT.

The effectiveness of these impact-reduction strategies is discussed further below.

The CISGP includes eight different land use categories, which the CISGP calls "zoning types": an Innovation & Mixed Use District, a University District, an Innovation Campus District, an Eco-Industrial District, an Attraction District, an Urban Recreation District, an Agriculture District, and a Conservation District. The Innovation & Mixed Use District includes four subtypes: Town Centers, High Density Industrial Mixed Use, Office and R&D, and Office Industrial. See Exhibit 3-1, which shows the CISGP zoning types and subtypes overlaid onto an aerial photo. A side-by-side comparison of the CISGP zoning types with the SAP/PRSP land use designations would reveal differences in how each of the land use categories allows various land use types.

However, taken as a whole, across the entire plan area, the CISGP allows land uses similar to those allowed in the SAP/PRSP (e.g., residential, commercial, office, university, entertainment, mixed-use, industrial, research and development, open space), although they may be distributed between the various zoning types and land use designations differently. Therefore, additional discussion related to the differences between the individual land use designations versus zoning types is not needed. The Agriculture District is an exception and is discussed further below. The key differences between the CISGP and the SAP/PRSP relate largely to the area and intensity of development, plan wide.



Source: data provided by Mintier Harnish in 2016

Exhibit 3-1

Citizen-Initiated Smart Growth Plan

ASCENT ENVIRONMENTAL

As reported in the CISGP (pages 50–51), implementation of the plan would add over 84,000 residents occupying over 46,000 new units within the existing SIA boundary. For context, the population of the city of Rocklin was estimated to be 67,000 in 2018 [U.S. Census Bureau 2018]. The CISGP would add over 32 million square feet (sq. ft.) of office and retail development and over 36 million sq. ft. of industrial development. The CISGP states (page 48) that the total development area is 3,868 acres. The CISGP includes 2,564 acres of conservation land, 849 acres of urban recreation, and 484 acres of agriculture and urban reserve.

COMPARISON OF CISGP TO SAP/PRSP

The CISGP includes a detailed comparison of the plan's development capacity with that of the SAP/PRSP. Tables 3-1 and 3-2 provide comparisons of the CISGP and SAP/PRSP. Table 3-1 compares numbers related to overall population, jobs, housing, and jobs-to-housing ratio. Table 3-2 compares development capacity of various land use types (note that some assumptions were made, due to differences in the way these land use types were presented). Both Table 3-1 and Table 3-2 show the SAP/PRSP numbers as they were presented in the CISGP, as well as the numbers presented in the Draft EIR (primarily from Section 4.12, "Population, Employment, and Housing," and Table 6-1 in Chapter 6, "Alternatives"), because the CISGP's numbers for the SAP/PRSP project did not match the numbers in the Draft EIR.

Table 3-1 SAP/PRSP and CISGP Population, Employment, and Housing Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Population Added	19,314	17,367	84,080	64,766
Jobs Added	55,760	192,879	151,463	95,703
Housing Units	8,094	8,950	49,614	41,520
Jobs-to-Housing Ratio	6.88	21.55	3.05	-3.83

Sources: Placer County 2018; AEL 2019

Table 3-2 SAP/PRSP and CISGP Development Capacity Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Residential				
Single-Family Residential	3,082 du	5,726 du[1]	1,428 du[1]	-1,654 du
Age-Restricted Residential	1,050 du	–	–	-1,050 du
Multi-family Residential	3,962 du	3,224 du	48,186 du	44,224 du
Commercial/Industrial				
Retail Floor Area[2]	4.92 million sq. ft.	30.46 million sq. ft.	22.5 million sq. ft.	15.72 million sq. ft.
Office Floor Area	2.35 million sq. ft.	26.05 million sq. ft.	9.29 million sq. ft.	6.94 million sq. ft.
Industrial/R&D Floor Area	26.00 million sq. ft.	20.16 million sq. ft.	36.76 million sq. ft.[3]	10.76 million sq. ft.
Public				
University	30,000 students; 3 million sq. ft.	3.24 million sq. ft.[4]	2.48 million sq. ft.[4]	-0.52 million sq. ft.
Public Facilities	16.6 acres	–	–	N/A
Recreation/Open Space				
Parks/Open Space	334.6 acres[5]	335 acres	849 acres	514.4 acres
Preserve/Mitigation Area	2,528.6 acres	2,278 acres	2,564 acres	35.4 acres

Table 3-2 SAP/PRSP and CISGP Development Capacity Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Agriculture				
Agriculture	–	–	484 acres	484 acres

Notes: du = dwelling units; sq. ft. = square feet.

[1] Includes large-lot detached, small-lot detached, and attached (townhome-style) single-family units identified on CISGP page 50.

[2] Includes entertainment/mixed-use.

[3] Assumed to include R&D uses.

[4] It is assumed that "Education Building Area" in the CISGP refers to university uses (page 51).

[5] From Draft EIR Table 4.13-10.

Sources: Placer County 2018; AEL 2019

As shown in Tables 3-1 and 3-2, the amount of development and resulting population and employment are substantially higher under the CISGP than under the SAP/PRSP. The CISGP would result in over four times more direct population growth than the SAP/PRSP and nearly three times more employment. The CISGP includes six times more residential units and double the amount of commercial/industrial floor area. The CISGP includes more than double the amount of parks and open space, but the preserve/mitigation area is roughly the same. The CISGP includes 484 acres of land dedicated to agricultural uses, which is not a land use category included in the SAP/PRSP. It is unclear how the CISGP accommodates public services. There is a line item on page 51 for "Education Building Area," which is assumed to accommodate the university as there are no other education uses identified under the other categories; however, it is possible that it encapsulates K-12 facilities. The CISGP does not appear to quantify other public services such as law enforcement facilities or fire stations, nor is it clear that the plan includes these facilities at all as they are not identified in the Zoning Place Types Table on page 43 of the CISGP.

The CISGP is a much more aggressive plan than the SAP/PRSP in terms of the amount and intensity of urban development; it places a substantially greater amount of development in a smaller development area. Although information is not provided in the plan that would allow a direct "apples-to-apples" comparison of the residential density and commercial intensity of the two plans, based on the overall level of development identified and the area of development, the urban scale in many portions of the CISGP, upon plan buildout, would appear similar to a downtown setting in a midsized city, such as Sacramento, dominated by low- and midrise buildings, with some high-rise structures. By contrast, while the SAP/PRSP identifies higher residential density and commercial intensity than other existing developments in the vicinity and would allow multistory structures (including some high-rise buildings in the Entertainment Mixed-Use [EMU]), the overall urban scale would be much lower than under the CISGP and would contrast less with scale of surrounding development. The CISGP is designed based on the premise that its proposed level of urban intensity would increase energy efficiency, increase transit opportunity, create a better internal jobs-housing balance, and have better consistency with Sacramento Area Council of Government's (SACOG's) Sacramento Region Blueprint (Blueprint).

SACOG BLUEPRINT AND MTP/SCS CONSISTENCY

The CISGP suggests that it is more consistent with SACOG's Blueprint than the proposed project. The Blueprint is a visionary plan that promotes several smart-growth principles to encourage a variety of housing options in proximity to employment, shopping, and entertainment hubs. Adopted by the SACOG Board of Directors in 2004, the Blueprint includes a growth scenario (map) for 2050 that provides a concept-level illustration of how the region could grow using the growth principles, but it is not intended to be applied or implemented in a parcel-specific manner. The Blueprint Special Report identifies several smart-growth objectives, including housing choice and diversity, use of existing assets, compact development, and natural resource conservation. The CISGP focuses on many of these Blueprint objectives, especially the objective related to compact development. However, it seems to focus less on the Blueprint's goal of housing choice

and diversity. The Blueprint Special Report (page 4) states that providing a variety of places where people can live—apartments, condominiums, townhouses, and single-family homes on varying lot sizes—creates opportunities for the variety of people who need them: families, singles, seniors, and people with special needs (SACOG 2007). The CISGP offers primarily apartments and condominiums with some attached townhomes allowed, but no detached single-family homes.

As noted in Section 1 of the PRSP, the objective for Blueprint consistency is to create a development plan that provides higher-density residential neighborhoods, compact forms of development, alternative transportation options, and an interconnected network of residential neighborhoods, commercial nodes, and employment centers. The PRSP's development plan incorporates measures to achieve its stated Blueprint objective and to implement SACOG's adopted Blueprint growth principles. For example, a 200-acre mixed use Town Center is planned, which is located adjacent to a planned university and 335-acre employment center. This district allows for over 1,300 high-density residential units at a density of approximately 26 units per acre, over 500 single-family homes with a compact development form, and over 600,000 sq. ft. of commercial/office uses. In total, approximately 33 percent of the PRSP's planned residential units are provided in the Town Center district and are located in walkable distance to nearby commercial and employment uses. Additionally, the students and employees from the university, as well as employees from the Campus Park employment center, are in walking distance to the Town Center's commercial centers. By concentrating the PRSP's highest-density and intensity uses into a single area, which is adjacent to the university and employment center, the development plan implements several Blueprint principles related to mixed-use development, compact development, housing choices, and transportation choices.

In addition to the smart-growth principles designed into the Town Center, the PRSP also supports alternative transportation modes and natural resource conservation. The PRSP includes a route for bus rapid transit along major roadway corridors serving the Campus Park employment center, the university, and the Town Center. The project also includes a network of Class I bike paths that link the employment center, university, and Town Center with the residential neighborhoods, schools, and parks. These two elements of the development plan further support the Blueprint principle related to transportation choices. The PRSP also sets aside nearly 240 acres of permanent open space, not including open space areas within the university site or other planned parks and paseos within the university. The PRSP's open space network preserves habitat associated with on-site creeks, drainage ways, wetland features, and grassland, which supports the Blueprint principle related to natural resource conservation.

Finally, a comprehensive set of community Design Guidelines are included as part of the PRSP development plan, which require that future development projects collectively create a quality community. These Design Guidelines support the Blueprint principle to create quality design in newly developing communities. In summary, these design features and elements of the PRSP enable the project to be consistent with SACOG's vision for the Blueprint.

It is also important to note that SACOG's 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) identifies the SAP area as a "Developing Community," which it defines (page 27) as typically situated on vacant land at the edge of existing urban or suburban development. Developing Communities are the next increment of urban expansion. They are identified in local plans as special plan areas, specific plans, or master plans and may be residential-only, employment-only, or a mix of residential and employment uses. Transportation options in Developing Communities often depend, to a great extent, on the timing of development. Bus service, for example, may be infrequent or unavailable today, but may be available every 30 minutes or less once a community builds out. Walking and bicycling environments vary widely though many Developing Communities are designed with dedicated pedestrian and bicycle trails. This description is not consistent with the CISGP, which includes medium- and high-density residential development and intense commercial development.

The CISGP more closely resembles the Center and Corridor Community, which the MTP/SCS (page 26) defines as having land uses that are typically higher density and more mixed than surrounding land uses. Centers and Corridors are identified in local plans as historic downtowns, main streets, suburban or urban commercial corridors, rail station areas, central business districts, or town centers. They typically have more

compact development patterns, a greater mix of uses, and a wider variety of transportation infrastructure compared to the communities surrounding them (SACOG 2016).

JOBS-HOUSING BALANCE

The CISGP seeks to create an internally focused jobs-to-housing balance and also aims to increase energy efficiency and promote transit opportunities by increasing density and intensity of urban development. Regarding the jobs-to-housing balance, an internally balanced jobs-to-housing ratio does not provide benefit if it does not consider the context of the regional jobs-to-housing ratio. While the CISGP would result in an internal jobs/housing balance, the CISGP does not help the jobs/housing balance in the project vicinity, which is more housing heavy. As explained in the Draft EIR (page 4.12-5), the market analysis prepared for the SAP noted that prevailing literature shows that a jobs to housing ratio of 1.5 is ideal (Economic & Planning Systems, Inc. [EPS] 2015:42). In 2012, the South Placer area had approximately 1.31 jobs for every housing unit, indicating that South Placer should add more employment opportunities to strike a better balance (EPS 2015:42). More specifically, the Draft EIR (page 4.12-13) states while the Cities of Rocklin and Roseville have ratios of 1.24 and 1.22, respectively, the overall ratio for the whole of Placer County is 1.08. Looking strictly at the numbers for project buildout, the project would add substantially more jobs than housing units, making it a "jobs-rich" area. However, viewed in the context of all of Placer County, the project's contribution would serve to provide more balance to Placer County. As stated in the Draft EIR (page 4.12-11), if the proposed project were built out today, it would increase the unincorporated county's jobs-to-housing ratio from 1.08 to 1.36, which is generally considered balanced. Conversely, by maintaining an internally balanced jobs-to-housing ratio, the CISGP does not help balance the existing jobs-to-housing ratio in the region.

Regarding energy efficiency and transit opportunity, the CISGP states (page 47) that the plan strives to decrease GHG emissions per capita rather than displace the effect. This suggests that the CISGP is designed to absorb regional development capacity such that it would diminish development elsewhere, thus replacing less efficient (the CISGP assumes) development planned in the vicinity with the CISGP's more efficiently designed development. This replacement of currently planned development is critical for the CISGP to succeed in offsetting its substantial (albeit relatively more efficient) vehicle trip generation, energy consumption, and GHG emission. (For more details regarding the CISGP's trip generation, energy consumption, and GHG emission, see the "GHG and Air Quality Impacts" discussion below under the heading "Effectiveness of Impact Reduction.") Otherwise the substantial level of development (and all of the associated traffic, energy consumption, and GHG emissions) included in the CISGP would be additive to the development currently planned in the vicinity, including in the cities of Lincoln, Rocklin, and Roseville. However, the CISGP does not include a mechanism to ensure that development would occur within the CISGP and not within other areas in the vicinity that are planned for development; rather, the plan seems to trust that the future real estate market would demand high-density, metropolitan-style development. The CISGP does not include any market studies or other evidence that would explain how the real estate market would support a new metropolitan center surrounded mostly by existing suburban communities. The EPS market study prepared for the SAP/PRSP suggested that the SAP would not achieve full buildout until 80 years or beyond. Without a market study, it is unclear, and the CISGP does not provide any evidence to support, how the CISGP—a development within roughly the same plan area with several times more development capacity than the SAP/PRSP—would have enough market demand to ever achieve full buildout. It is also unclear how a plan with so much high-density residential development could be viable in a location where the local market appears to have historically favored subdivisions with mostly detached single-family units.

FEASIBILITY OF CISGP

Market Feasibility

To better understand the market feasibility of the CISGP, the County asked EPS to review the CISGP and provide its professional evaluation. The following discussion is based on the EPS memo dated, July 18, 2019.

The CISGP envisions development of about 49,600 residential dwelling units, of which 97 percent are identified to comprise multifamily development, with the remaining percentage comprising single-family attached townhomes (which is a multifamily product but distinguished in the CISGP from other multifamily units). Per the plan, dwelling units are shown to have average densities ranging from 24 units per acre to 77 units per acre, although the CISGP does not provide relative percentage of total units by housing typology or density category.

There is no evidence to suggest the quantity of high-density residential development proposed under the CISGP is supportable in the South Placer market location, both currently and over the next several decades. The amount and similarity of the high-density residential development proposed in the CISGP would have a protracted absorption schedule, based on existing and projected market conditions that indicate limited demand for multifamily development, described in detail below. Further, reserving land for high-density residential that is not supportable in the foreseeable future can have detrimental impacts on the local economy, tying up land that will not be used and imprudently using resources to fund and construct infrastructure in support of vacant parcels.

There is current and long-term support for multifamily high-density development in the project area and throughout Placer County. The quantity, rate of absorption, location, and density of development will be dictated by the parameters of localized supply and demand variables, as described below. Higher-density development will likely occur close to existing and emerging employment centers in the county and other areas where demand and land values are highest, including the proposed employment and entertainment centers envisioned in the SAP/PRSP. That said, landowners, upon weighing supply and demand variables and evaluating financial feasibility, will develop residential products at densities consistent with current and proposed average residential densities until land values, other cost and revenue variables, and consumer preferences support higher densities.

Housing markets reflect a myriad of conditions related to both demand and supply. Demand for housing is determined by various factors, including housing prices; population (size of the market); household income; employment opportunities; transportation options and costs; interest rates; availability of credit; a long-term economic outlook; and other factors. Housing supply is similarly affected by a number of different factors, including housing cost, land value, landowner expectations and preferences, government regulations, availability of financing, and other factors.

Residential density reflects a balance between supply and demand for land in a specific location. High demand for a specific location *cause*s higher land prices and the efficient consumption of land (higher-density development) while low demand causes the converse. Density is an *indicator* of market constraints, primarily driven by household and business income, land supply, and transportation efficiencies and cost (EPS 2019).

Empirical data from a large sampling of cities worldwide, with differing cultures, histories, economies, climate, topographies, and employment center development (i.e., centralized versus dispersed), show a predictable spatial pattern correlating land values and residential density. That is, land prices and densities are highest in the central business district (or geographical center) and decline commensurate with distance from the center (EPS 2019). This pattern is observed nearly universally because land and housing prices and densities abide by the supply and demand model. Locations far from geographical centers and areas of high consumer demand have not been found to support high-density development.

From an individual landowner perspective, landowners are incentivized to construct the highest and best use on their land. “Highest and best use” is a widely used economics term to describe the use that is reasonably probable, physically possible, supported by the market, and returns the highest value to the land (Schwenker 2019). Landowners prepare pro forma analyses, evaluating the cost of land and vertical construction, sale or leasing revenues, and profit margins to determine the type and quantity of appropriate development types. Landowners must balance these inputs with market demand, supply variables, and preferences for risk and timing, to determine their willingness to construct different types of development.

The prevailing highest and best use for residential-zoned land in Placer County is single-family detached housing. Approximately 80 percent of housing units countywide *and* in the South Placer market are single-family detached, while remaining units comprise multifamily and other housing units (e.g., mobile homes) (U.S. Census Bureau 2013-2017). For context, relative to the amount of high-density housing proposed in the CISGP (nearly 50,000 multifamily units), the county currently contains approximately 13,000 multifamily units (EPS 2019). In addition, the current inventory of multifamily housing in the county has an average density of about 20 units per acre (CoStar 2019).

Recent historical absorption of residential development in the county has a consistent allocation of housing typology as the overall housing inventory. Between 2009 and 2017, the county added just under 2,000 units annually, primarily concentrated in south Placer County. Of these units, about 1,500 units (about 75 percent) were single-family, while about 450 units (almost 25 percent) were multifamily (U.S. Census Bureau, 2005-2009 and 2013-2017).

Based on multiple population and housing projection data sources, the county (inclusive of all incorporated cities and the unincorporated county) is anticipated to add 10,400–23,900 new units between 2018 and 2040 (about 500–1,100 units, annually). The South Placer market is anticipated to accommodate most of this growth, adding 7,300–16,700 new units between 2018 and 2040 (about 330–800 new units, annually). Of new residential units planned in the South Placer market, there is overwhelming support for new single-family detached development over other residential types. Market demand preferences support nearly 90 percent single-family detached housing development, with the remainder comprising multifamily development (EPS 2019). Applying the projected annual units estimated to be supported by market demand, the CISGP could take upwards of 150 years to absorb (if all units projected to absorb in the South Placer market occurred in the Sunset Area, which is unlikely given other planned development and the homogeneity of residential uses proposed under the CISGP).

There are numerous specific plans being planned in the South Placer market in addition to the SAP. The land use programs for each project are developed through a detailed process of weighing supply and demand variables with an assessment of the landowners' highest and best uses. In aggregate, residential land uses for proposed specific plans comprise approximately 80 percent single-family detached housing and 20 percent higher density multifamily housing. The average density of proposed multifamily housing units is about 21 units per acre. (The breakdown of housing units by tenure is derived from Bay Area Economics 2018, cited in EPS 2019. Projects included those in the South Placer market area only: Placer Ranch, Bickford Ranch, Riolo Vineyards, Regional University, Amoruso, and Lincoln Village 5.)

In summary, there will be demand for multifamily housing in Placer County and, specifically, in the project area. However, existing and projected economic conditions do not support the amount and densities of proposed residential development in the CISGP in the short term or over the next several decades.

CISGP University Feasibility

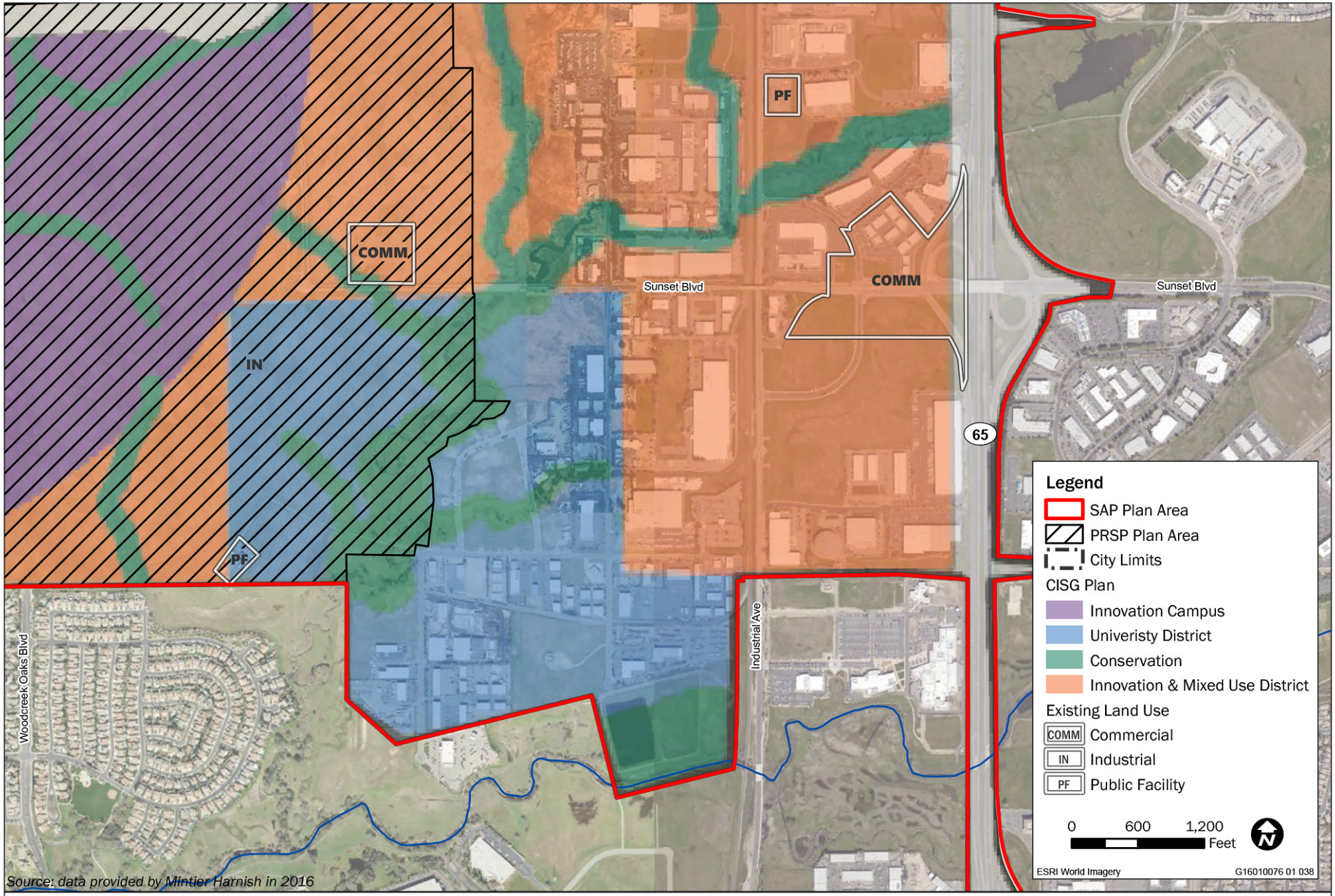
In addition to issues with real-estate-market-related feasibility, implementation of the CISGP presents other feasibility issues. One of the most prominent relates to the proposed Sac State–Placer Center, which is a key piece and a core objective of the PRSP. There are two primary feasibility issues related to the University District included in the CISGP. The first is that most of the University District is located outside the existing PRSP boundary. Under the PRSP, the land for the Sac State–Placer Center site would be donated by the PRSP landowner. If the site was moved outside the PRSP, the land would not be available for donation, and the County, the California State University (CSU) system, or another entity would need to purchase the land. However, the land designated University District in the CISGP is already owned by a variety of other landowners. Therefore, the CSU or County would need to find willing sellers and/or condemn the private property via eminent domain (which requires fair-market-value payment to the property owners). Either of these options would require substantial additional public funds and would render the University District portion of the CISGP financially infeasible. In addition, even if funds were available, the County would not consider undertaking an eminent domain action on a significant amount of land in this area if property owners were not willing to sell; this would also render the University District infeasible as shown in the CISGP.

The second feasibility issue related to the CISGP's University District location is that it encompasses a substantial area of land that is already developed. See Exhibit 3-2. In order to develop these properties with university uses, the existing structures and infrastructure would need to be either demolished or repurposed. The CISGP promotes adaptive reuse of these structures and infrastructure as a positive aspect of the plan, indicating that adaptive reuse will help the university develop with less infrastructure and utility expansion cost. When feasible, adaptive reuse of structures is usually environmentally superior to demolition and new construction. Adaptive reuse is often a viable strategy when one, or possibly a few structures are involved and is most commonly used to avoid demolishing historic or otherwise important/valuable structures. However, the large, primarily single-story existing warehouse-style buildings that dominate the CISGP's University District are not historically significant and are incongruous with the types of structures necessary for a modern university campus. Also, the current layout of the existing structures, which are separated from each other by roadways, vacant land, and parking lots, would present major constraints for designing a cohesive university campus that is internally and externally well-integrated and that would allow convenient pedestrian access between buildings. Finally, the infrastructure (i.e., roads, power/gas lines, and water/wastewater lines) currently supporting the existing industrial uses would not be sufficiently sized to support an entire university use, as suggested by the CISGP.

As previously mentioned, the proposed Sac State–Placer Center is a central piece of the PRSP portion of the SAP. One of the primary objectives of the PRSP (Draft EIR page 3-7) is "to establish a site for California State University, Sacramento–Placer Campus: Provide 300 +/- acres to CSU for development of a Sacramento State (Sac State) off-campus center in Placer County, which is sized to potentially accommodate up to 30,000 students (25,000 Sac State and 5,000 Sierra College)." Failure to include a feasible university site means failure to meet a core project objective. The proposed university site is also key to meeting other stated project objectives, including those related to providing a balanced land use mix, catalyzing development of the Sunset Area, establishing a major employment, and incorporating a Town Center (adjacent to a university). Because the CISGP's University District is considered infeasible, the CISGP would not meet these critical project objectives.

One-Mile Landfill Buffer Feasibility

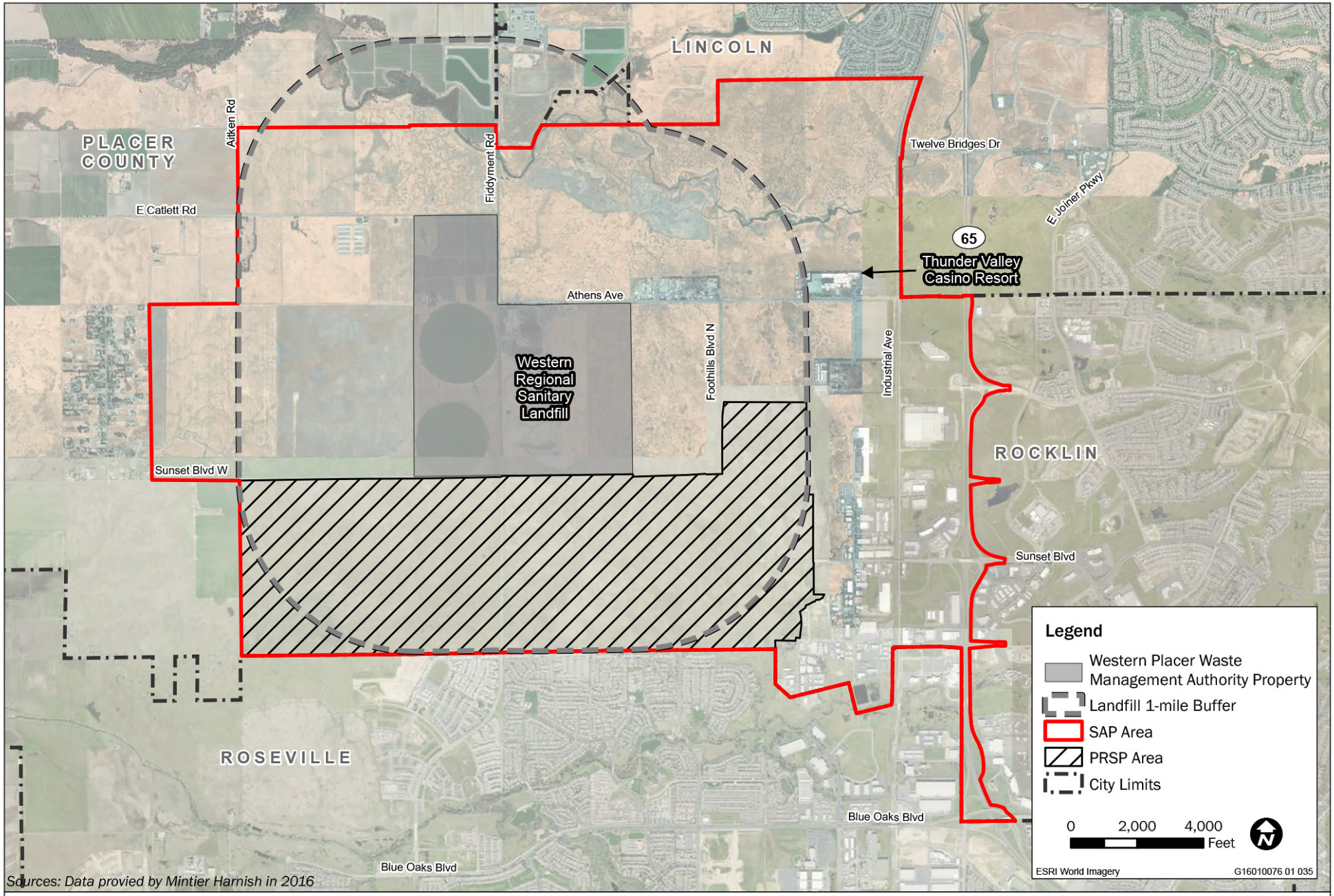
It is important to note that the primary reason offered by the CISGP for siting the University District in the selected location was to move it outside the existing 1-mile landfill buffer. This attempts to reduce the project's significant impacts related to odor and land use compatibility. The County understands the difficulty in identifying land outside the 1-mile buffer that could feasibly support development of sensitive land uses, including a university. During the alternatives development process, County staff and consultants examined undeveloped areas outside the 1-mile buffer that would be appropriate for sensitive land uses. Exhibit 3-3 shows the land outside the 1-mile buffer. Unfortunately, due to the size and central location of the Western Placer Waste Management Authority (WPWMA) property in the SAP area, land outside the 1-mile buffer is limited to the corners and edges of the SAP area. Much of the land in these areas is already developed with existing industrial uses. Developed areas were not considered feasible for the reasons described above. Existing natural features such as creeks, as well as large existing preserve areas, further restrict the availability of developable land outside the 1-mile buffer. Large, contiguous areas of vacant land, which would be necessary to allow development of well-planned and well-integrated housing to support the proposed commercial uses and meet project objectives related to provision of housing, were not available in these areas. Vacant land in these areas would restrict residential development to a patchwork of small subdivisions surrounded and disrupted by existing industrial uses. It is important to note that, although the CISGP suggests an adaptive reuse approach for existing structures in the University District (which, as discussed above, would be infeasible), it does not provide an approach for addressing the same issue for the large number of existing industrial structures in other CISGP zoning types, most notably the types that allow residential uses, including the Town Center, Office and R&D, and high-density industrial mixed-use subtypes. It is unclear how the large, single-story existing structures, which have been historically used for industrial uses, would be appropriate for re-use as residential structures. It is also unclear how the zoning types that permit residential uses would function cohesively given the pattern of existing structures (discussed above).



Source: data provided by Mintier Harnish in 2016

Exhibit 3-2

Existing Structures within CISGP University District



Sources: Data provied by Mintier Harnish in 2016

Exhibit 3-3

One-Mile Landfill Buffer

ASCENT ENVIRONMENTAL

For these reasons, County staff found that an alternative to the project that meets most of the project objectives, while prohibiting sensitive uses within 1 mile of the WPWMA landfill property, was infeasible. The only alternative identified in the Draft EIR that maintains the 1-mile buffer is the No Project—1997 SIA Plan Alternative. The 1997 SIA Plan is consistent with the 1-mile buffer policy because the primary type of development allowed is industrial and other non-residential development types. However, as stated in the Draft EIR (page 6-28) implementation of the No-Project–1997 SIA Plan Alternative would not meet most of the primary project objectives for SAP and would not meet any of the primary objectives for the PRSP.

EFFECTIVENESS OF IMPACT REDUCTION

The following discussion identifies the primary project-related environmental impacts that the CISGP was designed to reduce and examines each with respect to the actual level of impact reduction that would likely be achieved by the CISGP.

Reduction of Farmland Impacts

The Draft EIR concludes that the SAP/PRSP would result in a significant impact regarding conversion of Farmland to nonagricultural use. Similar to the SAP/PRSP, the CISGP would also convert Farmland to nonagricultural use and would therefore, like the project, result in a significant and unavoidable impact. However, the CISGP includes an "Agriculture" district that would conserve some of the existing Farmland. Therefore, its impact would be less than the project, but would not avoid a significant impact.

Reduction of Odor Impacts

The CISGP is designed to reduce odor impacts by moving the University and other sensitive land uses outside the existing 1-mile buffer; however, as discussed above, the strategy is, ultimately, infeasible. It is also important to note that the 1-mile buffer was not established based on any empirical data related to distance from an odor source; therefore, the existing buffer should not be viewed as a boundary between areas exposed to odor from the landfill and areas not exposed. Odor complaints have been recorded well outside the 1-mile existing landfill buffer (see Draft EIR Exhibit 4.3-1); therefore, designing the project to maintain the 1-mile buffer would not likely avoid land use compatibility issues.

Another odor-related issue is the potential for increased solid waste generation to exacerbate the existing odor issue. Even if the CISGP excludes sensitive receptors within 1 mile of the landfill, because the CISGP includes several times more development than the SAP/PRSP, the solid waste generation associated with the CISGP would be greater than the SAP/PRSP. The Draft EIR states (page 4.3-50), "As odor generation is generally proportionate to the volume of waste generated and processed, the project would, at its peak, conservatively represent 16 percent of the odor currently generated at Western Regional Sanitary Landfill (WRSL), and at the time of landfill closure in 2058, it would represent approximately 8 percent of odor emissions." The Draft EIR concludes that exacerbation of the existing odor impact is significant. The CISGP would contribute a larger percentage of solid waste and, consequently, a larger proportion of the odor generated at WRSL because it would add waste from 64,766 additional people and 41,520 additional housing units over the SAP/PRSP. Therefore, the CISGP would exacerbate the existing odor issue to a greater degree than the project and would result in a substantially more severe significant environmental impact.

Wetlands Impacts

Regarding impacts on wetlands, the CISGP does not identify the methodology used for determining the number of acres affected; however, it does not rely on the information presented in the Draft EIR. The Draft EIR's method for calculating impacts on wetlands adheres to the method described in the Placer County Conservation Plan (PCCP). Furthermore, the impacts on wetlands identified in the Draft EIR for the PRSP are based on a wetland delineation that has been verified by the U.S. Army Corps of Engineers. Because the methodology used to determine these calculations in the CISGP is unknown, a direct "apples-to-apples" comparison of the data is not possible. However, it is illustrative to show the actual acreage calculation provided in the Draft EIR (for the category of impact that seems most analogous to the category presented in

the CISGP) compared to the acreage calculations provided in the CISGP. Table 3-3 provides a comparison of the acreages of the wetlands affected as presented in the Draft EIR versus the CISGP and shows that the SAP/PRSP would result in impacts to fewer acres of wetlands.

Table 3-3 SAP/PRSP and CISGP Wetland Impact Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers Assumed in CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
Acres of Direct Impact on Wetlands	2,617[1]	3,923/3,515[2]	3,753/2,942[2]	1,136/898[2]

[1] Combined total from Draft EIR Tables 4.4-4 and 4.4-5 "Acres of Direct Impact" column. This total includes all aquatic resource types, not just vernal pools.

[2] The CISGP identifies two different sources for their totals: County Vernal Pool Map and Whitham & Vollmar Vernal Pool Map. The numbers identified from both sources are presented.

Sources: Placer County 2018; AEL 2019

Even if the CISGP would reduce the loss of acreage of vernal pool habitat, the loss of between 2,942 and 3,753 acres of vernal pool complex from the Western Placer Core Area would still be a significant impact with the same uncertainties about the availability of existing mitigation bank credits or sufficient land available from willing sellers to establish compensatory mitigation projects to fully mitigate the loss of wetland functions, especially within the Western Placer Core Area. Also, although the CISGP proposes wider setbacks to riverine/riparian complex areas, it would still result in a linear preserve network surrounded by urban development such that riparian habitat value would be diminished for most species and riparian habitat would be subject to the similar indirect impacts from intrusion by humans and domestic pets, increased noise and light pollution, dumping or accumulation of litter and debris that is harmful to wildlife, and alteration of hydrologic regime (e.g., transition from seasonal to perennial inundation). Therefore, the impact conclusions would remain significant and unavoidable under the CISGP for the same reasons as for the proposed project. These reasons are stated under the "Significance after Mitigation" headings on pages 4.4-41 and 4.4-48 of the Draft EIR.

The CISGP also includes a lengthy comparison of the mitigation fees that would be required to mitigate impacts to wetlands. The PCCP fee analysis presented in the CISGP appears to have misapplied the draft PCCP Special Habitat (wetland) fees. The fee calculation applied the Vernal Pool Type Special Habitat fee to the gross acreage of land being converted from a natural/semi-natural land cover (vernal pool grassland complex) to urban uses, which would already be subject to a separate Valley Land Conversion fee. The draft Special Habitat fees are applicable only to directly/indirectly affected special habitats such as vernal pools, seasonal wetlands, streams, etc. Therefore, the CISGP overestimates the draft PCCP Special Habitat fees.

GHG and Air Quality Impacts

The CISGP is designed to reduce impacts related to GHG emissions and air quality. Table 3-4 compares the air pollutant, ozone precursor, and GHG emissions presented in the Draft EIR to the emissions reported in the CISGP. The methodology associated with the air pollutant and GHG emissions estimated for the CISGP are not described anywhere in the plan, nor are the activity data or emission factors shown. Conversely, the Draft EIR discusses in detail the methodology used to quantify emissions associated with the project in accordance with Placer County Air Pollution Control District (PCAPCD)-recommended methods. For example, because the thresholds of significance for air quality are in pounds per day, all emissions associated with the project were also reported in pounds per day in the Draft EIR. However, the CISGP incorrectly reports the emissions included in the Draft EIR in an annualized version and does not explain how the numbers presented in the Draft EIR were interpreted and annualized. For comparison purposes, Table 3-4 shows annualized emissions from the Draft EIR, which were calculated by multiplying the season with higher daily emissions by 365 days and dividing by 2,000 pounds per ton. This is considered conservative because it does not account for changes in the amount of emissions projected by season (i.e., summer vs. winter).

Table 3-4 SAP/PRSP and CISGP Air Pollutant and Greenhouse Gas Emissions Comparison

Pollutant (tons/year)	SAP/PRSP (Numbers from Draft EIR)[1]	SAP/PRSP (Numbers from CISGP)	CISGP	Difference (CISGP minus SAP/PRSP)
NO_X	151	792	966	815
PM_{10}	356	17.8	22	-334
$PM_{2.5}$	213	15.8	19	-194
SO_X	N/A	7.6	9	N/A
CO	1,485	6,406	7,809	-6,324
ROG	1,017	603	734	-283
GHG ($MTCO_2e$/year)	579,522	2,035,936	2,176,091	1,596,569

Notes: N/A = not available; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; SO_X = sulfur oxide; CO = carbon monoxide; ROG = reactive organic gas; GHG = greenhouse gas = $MTCO_2e$/year = metric tons of carbon dioxide equivalent per year.

[1] Emissions reported in Draft EIR are in pounds per day. To annualize, the season with higher daily emissions was multiplied by 365 and divided by 2,000.

Sources: Placer County 2018; AEL 2019

As shown in Table 3-4, the numbers assumed by the CISGP for the Draft EIR are considerably different, sometimes by a factor of 10 or more. This makes an equalized and therefore accurate comparison between the CISGP and the Draft EIR impossible. However, it is illustrative to compare the emissions presented in the CISGP with the emissions presented in the Draft EIR.

When comparing the project's emissions assumed by the CISGP for the SAP/PRSP project and the CISGP itself, the CISGP exceeds the total amount of criteria air pollutant, ozone precursor, and GHG emissions. The CISGP claims that because the population in the CISGP would be greater than that of the project, the emissions generated per capita would be less and therefore create a lesser impact. This analytic approach does not appropriately consider PCAPCD's thresholds. While PCAPCD has an efficiency threshold of GHG emissions per capita, PCAPCD proposed these thresholds for projects equal to or less than 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) (PCAPCD 2016:C-4). Further, PCAPCD has different thresholds for residential and nonresidential land uses. Nonresidential land uses included in PCAPCD's nonresidential efficiency threshold include general commercial, general office building, and general industrial. Because the project includes many nonresidential land use types that do not fit under these three categories (i.e., university, innovation center, and entertainment-mixed use), the appropriate threshold for the project is the bright-line threshold of 10,000 $MTCO_2e$. The CISGP states that annual GHG emissions at project buildout would exceed 2.1 million $MTCO_2e$. No mitigation is provided in the CISGP to reduce these emissions to meet the PCAPCD thresholds.

Ultimately, the CISGP would result in greater emissions of ozone precursors and GHG emissions in an area already in nonattainment for ozone. The impact associated with the CISGP would be greater than that of the project.

The CISGP also presents an analysis of carbon storage potential for both the CISGP and the project. Again, the CISGP does not provide the methodology used to derive the numbers presented. Carbon storage potential was not quantified in the Draft EIR because, as an area plan, the specific vegetation types and acreages prior to and after development are unknown; therefore, such quantification would be speculative.

Vehicle Miles Traveled

Using similar strategies to reduce mobile-sources of GHG emissions, the CISGP is designed to reduce per-capita VMT by creating a denser plan with more opportunities for transit and other alternative transportation modes. However, when the CISGP presents the differences in VMT between the CISGP and the SAP/PRSP, the methodology used in the CISGP is not consistent with the methodology used in the Draft EIR. The Draft EIR's VMT analysis uses VMT per service population, whereas the CISGP uses VMT per capita. Per-capita VMT typically considers only the project's residential population, whereas service population considers

residential population, as well as employment and university student population. However, the per-capita VMT numbers presented in the CISGP appear to account for more than just residential population. It is unknown what the CISGP considered in the per-capita VMT estimates. For these reasons, an accurate, comparison of VMT per service population or per capita is not possible. However, given the very high density of the CISGP, it is likely that the VMT per service population (and per capita) would be lower than the proposed project. Table 3-5 presents the VMT numbers presented in the CISGP and the Draft EIR.

Table 3-5 SAP/PRSP and CISGP VMT Impact Comparison

	SAP/PRSP (Numbers from Draft EIR)	SAP/PRSP (Numbers Assumed in CISGP)	CISGP[1]	Difference (CISGP minus SAP/PRSP)
Total Annual VMT	1.3 billion[2]	2.7 billion	2.6 billion	1.3 billion
VMT per Service Population	12,465[3]	–	–	–
VMT per Capita	–	7,161	6,631	–

[1] No methods are provided for VMT estimates in the CISGP; therefore, the accuracy of these estimates cannot be verified. This comparison is provided for illustrative purposes.

[2] Daily project generated VMT from Draft EIR Table 4.4-32 converted to annual VMT (3,624,520 VMT/day x 365 days/year).

[3] Daily VMT per service population from Draft EIR Table 4.4-32 converted to annual VMT per service population (34.15 VMT/service population/day x 365 days/year). This includes existing conditions.

Sources: Placer County 2018; AEL 2019

Although not as informative as service population or per-capita estimates, it is possible, for illustrative purposes, to compare the total annual VMT of the CISGP and the project. As shown in Table 3-5, the total annual VMT estimated for the CISGP is double the Draft EIR's estimate for total VMT for the project. Even though the VMT associated with each resident and employee of the CISGP may be lower than the project, the overall VMT is substantially higher. Although the CISGP does not provide methodology or data to allow conclusive comparison, total VMT that is double the proposed project would likely translate into a greater volume of vehicles on local and regional roadways, which, in turn, would result in greater impacts related to congestion on roadways and intersections compared to the proposed project. (Although it is possible that the development intensity proposed by CISGP could internalize vehicle trips to a greater extent than the proposed project, no evidence is provided that the CISGP would achieve a level of internalization substantial enough that it would not result in increased roadway volumes and congestion compared to the project.)

For the CISGP to accommodate a greater volume of traffic, additional roadway and intersection capacity would be needed beyond what is included in the proposed project. The CISGP does not include any information regarding the sizing of the transportation facilities, so it is unclear how this additional capacity would be provided.

UTILITIES AND PUBLIC SERVICES

The CISGP does not include information regarding the sizing of other necessary infrastructure, such as water/wastewater distribution and treatment, drainage infrastructure and retention, and solid waste capacity. Regarding water supply and distribution, an increase in the level of development typically results in an increased demand for potable and recycled water and a need for larger distribution pipelines. It is unclear how the CISGP, which includes six times more residential units and double the amount of commercial/industrial floor area, would tie into existing water infrastructure and whether existing water supply mains are large enough to support that much additional development. Moreover, as discussed in the Draft EIR (page 4.15-43), full buildout of the SAP/PRSP would require the construction of the planned Ophir Water Treatment Plant, and, to ensure water treatment capacity is available, Mitigation Measure 4.15-2 requires that no small lot tentative maps shall be approved unless and until adequate water treatment capacity is identified. It is uncertain whether the planned Ophir Water Treatment Plant would have enough treatment capacity to serve a project as large as the CISGP with other planned development. Additional studies would be required to determine whether the CISGP could be supplied with water; regardless, the impact on water supply would be greater than that of the proposed project.

The same issue is true of wastewater treatment. The CISGP does not describe how it would tie into the existing wastewater conveyance system or how wastewater treatment would be provided for a development so much larger than the SAP/PRSP. The Draft EIR states (page 4.15-50) that the Pleasant Grove Wastewater Treatment Plant has sufficient capacity to treat wastewater flows from buildout of the PRSP area, but not from the combined PRSP and net SAP areas. Additional wastewater treatment expansions would be needed for full implementation of the SAP/PRSP. Given the fact that the CISGP includes several times more development than the SAP/PRSP, the impact on wastewater treatment capacity would be greater. Additional studies would be needed to determine the extent of the impact and whether future treatment plant expansions could increase capacity to serve the CISGP.

It is also unclear how the CISGP would provide adequate public services, such as police protection, fire protection, schools, and libraries. The CISGP does not mention new fire or police protection facilities. The Draft EIR for the SAP/PRSP (page 4.13-28) indicates that the project would require approximately 23 new sheriff officers to meet the County standard of 1.2 officers per 1,000 residents. Based on the population of the CISGP stated in the plan, the addition of 84,000 residents would require approximately 101 new sheriff officers. Similarly, the Draft EIR (page 4.13-24) indicates that the SAP/PRSP would require between 21 and 28 new firefighters to meet County standards. Using the same standards, the CISGP would require between 73 and 93 new firefighters. The CISGP does not identify new fire stations or sheriff stations or otherwise explain how this increased fire and police protection service demand would be met.

Regarding schools, the CISGP (page 42) identifies "urban elementary school," "urban high school," and "urban middle school" as part of the "buildings mix" in the Town Center District. The Draft EIR indicates that the SAP/PRSP would generate approximately 1,800 new elementary school students, 700 new middle school students, and 800 new high school students. However, the CISGP would generate more than 5,500 elementary school students, 1,800 middle school students, and 1,600 high school students. (These calculations assume a student generation factor based on 100 percent high-density residential, which is lower than the rate for low- and medium-family residential; therefore, to the extent that a portion of the CISGP housing is low- and medium-density, the student generation numbers would be higher.) For context, the proposed new elementary school in the PRSP would accommodate approximately 800 students and the new middle school in the PRSP would accommodate approximately 1,000 students. Therefore, to fully meet its demand for schools the CISGP would require seven new similarly sized elementary schools and two new similarly sized middle schools. The Draft EIR (page 4.13-32) reports that there is existing and planned capacity for 1,618 high school students. The CISGP would consume all current and planned high school capacity in the vicinity.

CISGP AS A PROJECT ALTERNATIVE

As discussed up to this point, the CISGP is designed to reduce impacts associated with the project, but the plan is likely infeasible on the basis of physical constraints as well as the CISGP's inability to meet the project objectives. In addition, because it includes a much higher level of development, the CISGP would likely result in greater impacts on the environment compared to the SAP/PRSP, even though it might reduce some impacts due to its smaller development area. However, several commenters request that the CISGP be added to the Draft EIR's analysis of alternatives; some commenters suggest that the CISGP be approved instead of the project. For all of the reasons described above, the CISGP is not considered a feasible alternative that could avoid or substantially reduce significant impacts associated with the SAP/PRSP. It is therefore not added to the Draft EIR's analysis of alternatives. However, it is important to note that the Draft EIR already includes an alternative that shares many of the CISGP's strategies for reducing project-related impacts.

Alternative 4: Reduced Footprint, Similar Development Potential was identified in the Draft EIR as an alternative that would achieve the same level of development as the SAP/PRSP, but, similar to the CISGP, would reduce the overall development area and would be designed to reduce impacts on biological resources by providing increased buffers to avoid hydrological features and other wetland areas. See Exhibit 3-4. Also, although Alternative 4 does not include areas that would remain designated specifically for

agricultural use (like the CISGP's Agricultural district), limited farming activities would still be allowed within the SAP Preserve/Mitigation Reserve areas; therefore, although the impact to Farmland would be slightly greater under Alternative 4 than the CISGP, agricultural practices could continue within large portions of the net SAP area.

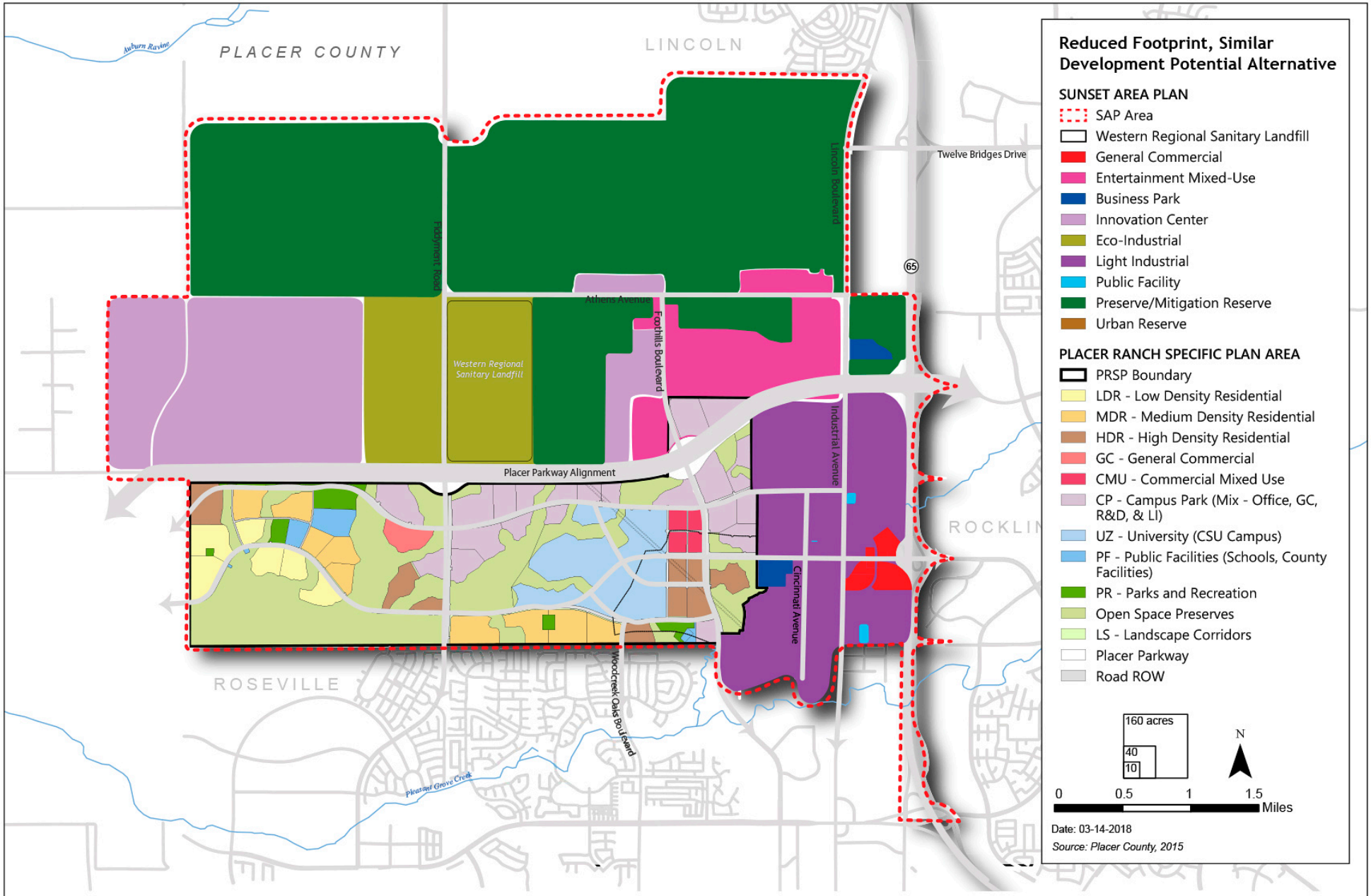
The Draft EIR indicates that Alternative 4 would remove nearly 1,500 acres of developable land from the project area. The combined development area of the SAP/PRSP would be approximately 5,500 acres. (Note that the development area for the SAP area cannot be accurately estimated because SAP policies require open space buffers to be incorporated into individual developments, and the specific amount cannot be determined at this time.) The removal of 1,500 acres of developable land would decrease the development area to approximately 4,000 acres. Based on the calculations provided in the CISGP for "development area" (page 48), this means Alternative 4 would develop just over 300 acres more than the CISGP. As mentioned above, the CISGP uses the SIA Plan boundary, which is more than 300 acres smaller than the Alternative 4 boundary. Therefore, the difference in the disturbance area between the CIGP and Alternative 4 equates roughly to the difference in plan area size, and the overall level of disturbance, acre-for-acre, would be similar.

Also similar to the CISGP, but not to the same extent, Alternative 4 would result in more compact development than the SAP/PRSP and would therefore have a lower per-capita VMT and per-capita GHG emission (although the overall emission of GHG and overall level of traffic impact would be similar to the project, as described in Chapter 6 of the Draft EIR, and less than the CISGP). However, Alternative 4 includes a more reasonable level of development than CISGP and a wider variety of housing options, including low density residential housing.

For the reasons described above, Alternative 4 is considered a more feasible and more reasonable alternative that achieves similar impact reductions for some environmental issue areas and more effective impact reduction for other environmental issue areas. The only exception is the impact to Farmland, for which the CISGP would result in a slightly lower level of impact; however, the impact to Farmland associated with both the CISGP and Alternative 4 would remain significant after mitigation.

Unlike the CISGP, Alternative 4 includes a potentially viable university site, located within the PRSP area (and therefore potentially still able to be donated) on land that is currently undeveloped (and therefore not constrained by existing structures and property ownership issues). Alternative 4 would therefore not conflict with primary objectives related to the Sac State–Placer Center.

After CCR Section 15204 describes the helpfulness of comments that suggest additional alternatives or mitigation measures that avoid or mitigate significant environmental effects, it indicates that reviewers should, at the same time, be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. The County acknowledges the substantial effort and thought put into the CISGP. County staff examined the various aspects of the CISGP that targeted significant impacts to determine if there were elements that could be incorporated into the project or one of the alternatives. However, as described above, the feasibility issues, especially the issues with the university site and the sheer magnitude and intensity of urban development, as well as the inability to meet primary project objectives, cause the CISGP, and even the separate elements of the CISGP, to fail as a viable alternative to the proposed project. In addition, as discussed above, the CISGP would actually result in greater impacts associated with several of the significant impacts the plan seeks to reduce, most notably traffic and GHG emissions. Finally, the Draft EIR includes Alternative 4, which aims to reduce environmental impacts associated with ground disturbance, especially biological resources, in a similar fashion as the CISGP, but, unlike the CISGP, would not generate significantly greater levels of GHG emissions. The County considers Alternative 4 to be a more reasonable and effective alternative to the project. Therefore, the County is not revising the Draft EIR to include the CISGP as an alternative to the project.



Source: Mintier Harnish 2018, MacKay & Somps 2018

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Exhibit 3-4

Alternative 4: Reduced Footprint, Similar Development Potential

ASCENT ENVIRONMENTAL

3.1.3 Master Response 3: Placer County Conservation Program and Mitigation

Several comments were received that raised issues concerning the PCCP. Comments primarily focused on the Draft EIR's use of the PCCP, which has not yet been adopted, but the public review draft EIR/EIS was circulated for public review between June 21, 2019 and August 20, 2019, and may serve as a feasible permitting/mitigation approach. To provide clarity, this master response provides additional overview of the PCCP, as well as a status update. This response also explains how the Draft EIR identifies the PCCP as a mitigation approach, but also identifies an alternative mitigation approach if the PCCP is not adopted or is otherwise not available as a permitting and mitigation strategy for individual development projects.

As described in the Draft EIR (page 4.4-28), the PCCP includes two separate but complementary plans or programs that support two sets of state and federal permits:

- The Western Placer County Habitat Conservation Plan and Natural Community Conservation Plan, referred to as the HCP/NCCP or Plan, is a joint HCP and NCCP that would protect fish and wildlife and their habitats and fulfill the requirements of the federal Endangered Species Act (ESA), California Endangered Species Act (CESA), and California Natural Community and Conservation Planning Act (NCCP Act).

- The Western Placer County Aquatic Resources Program, referred to as the CARP, would protect streams, wetlands, and other water resources and fulfill the requirements of the federal Clean Water Act (CWA) (Sections 404 and 401) and analogous state laws and regulations.

The purpose of the PCCP is to protect and enhance ecological diversity and function, including aquatic resource functions and values in western Placer County while allowing appropriate and compatible growth in accordance with applicable laws. To this end, the Western Placer County HCP/NCCP describes how to avoid, minimize, and mitigate effects on endangered and threatened species, thereby addressing the permitting requirements relevant to these species for activities conducted in the PCCP area by the Permittees. The PCCP also describes the responsibilities associated with operating and maintaining the new habitat reserves that will be created to mitigate anticipated effects resulting from growth and development activities.

In addition, the Western Placer County In-Lieu Fee Program is a program under which compensatory mitigation requirements under Section 404 of the CWA can be fulfilled by payment of a fee. The In-Lieu Fee Program would provide wetland mitigation "credits" that can be used to fulfill Section 404 compensatory mitigation requirements. The In-Lieu Fee Program would provide compensatory mitigation for impacts on aquatic resources for all projects and activities that are covered under the HCP/NCCP and the CARP.

Further, the CARP provides a means to fulfill the requirements of federal, state, and local laws that protect aquatic resources using the HCP/NCCP's comprehensive, long-term, regional conservation strategy. This regional strategy focuses authorized impacts on aquatic resources near or within existing urban areas and away from rural, intact natural areas, thereby avoiding and minimizing impacts on aquatic resources on a regional scale. The CARP uses a watershed approach to identify intact watersheds for conservation, creation, and establishment of aquatic resources, while authorizing development in watersheds that are already degraded and fragmented by development. This comprehensive regional approach to aquatic resource conservation and mitigation in western Placer County provides a greater level of landscape- and watershed-scale protection of aquatic resources than is possible with project-by-project permitting under the federal CWA Sections 404 and 401, and the California Fish and Game Code 1602 programs. The SAP/PRSP is considered a Covered Activity under the HCP/NCCP and, with compliance with appropriate avoidance and minimization measures, the project will be able to mitigate impacts through the PCCP, if the program is approved.

Under the HCP/NCCP, in order to qualify as avoided land (and therefore not subject to PCCP fees), an area must meet applicable habitat requirements as well as at least one of the six PCCP avoidance criteria (whereas public comments implied that all six of the criteria must be met, including being at least 200

contiguous acres). For example, if an area is less than 200 acres in size it can still be considered avoided land not subject to fees as long as it is connected to the stream system. Under the PCCP, a determination of avoidance will be made by the agencies with jurisdiction over the project. Although land that has been deemed avoided is not subject to fees, qualifying as "avoided" does not necessarily mean that the land is suitable for incorporation into the Reserve System in lieu of fee payment. If the avoided land is proposed for inclusion into the Reserve System, the state and federal Wildlife Agencies must review and approve inclusion, and inclusion would need to be supported by site-specific study and planning.

As mentioned above, the Draft EIR presents two possible paths forward for biological impact mitigation: (1) permitting/mitigation under the PCCP, pending its approval by the Board of Supervisors and issuance of state and federal regulatory permits, and (2) traditional project-specific regulatory permitting/impact mitigation, if the PCCP is not approved, or otherwise remains unimplemented. The PCCP may considered for adoption by the Placer County Board of Supervisors as early as the end of 2019 or early 2020. If the public review draft PCCP is approved and the program implemented prior to the project being independently granted state and federal regulatory permits, the project would be subject to the PCCP's landscape-scale regional conservation strategy and avoidance, minimization, and mitigation measures.

The Draft EIR provides participation in the PCCP as an option for permitting and mitigating project impacts on biological resources covered under the PCCP should it be adopted and available, by the time future projects are implemented. Participation in the PCCP would be the preferred mitigation approach and is required under SAP policy and PRSP development standards, if it is available when individual projects are implemented, because it provides a comprehensive landscape-level approach to conservation that would result in a large, interconnected preserve system to better ensure long-term survival and protection of covered species and habitat. However, the Draft EIR does not rely solely on the PCCP for impact mitigation; there are optional mitigation measures and front-loaded policies and programs, presented under the heading "Proposed Sunset Area Plan Goals and Policies" beginning on page 4.4-31 of the Draft EIR, that mitigate the project's potential impacts on biological resources in the event the PCCP, including the Western Placer CARP and associated U.S. Army Corps of Engineers programmatic permits, are not adopted or are not available as a permitting and mitigation strategy for future projects.

Under the traditional project-by-project permitting regime (i.e., standard state CESA and Fish and Game Code Section 1602 and federal ESA, 404, and 401 permitting), wetland and habitat mitigation, both on- and off-site, would require the preparation of mitigation plans for approval by the state and federal regulatory agencies. Implementation of these plans under state and federal permits and compensatory mitigation requirements would ensure mitigation is provided consistent with state and federal laws. Depending on their specific circumstances, future mitigation plans may be subject to CEQA/National Environmental Policy Act and may require additional project-level analyses; the potential effects of these plans would be too speculative at this time to predict in a meaningful way.

In the absence of the PCCP, impacts on wetland and riparian habitats and stream zones are mitigated through implementation of the following SAP policies and mitigation measures:

- Policy NR-2.4: Stream Habitat Mitigation,
- Policy NR-2.5: Setback Area Protection and Maintenance,
- Policy NR-3.1: Sensitive Habitat Buffers,
- Policy NR-3.3: Stream Corridor Encroachment,
- Policy NR-3.4: Stream Corridor Natural Conditions,
- Policy NR-3.5: Stream Protection Best Management Practices and Low Impact Development,
- Mitigation Measure 4.4-1a: Compensate for loss of aquatic resources, and
- Mitigation Measure 4.4-6a: Avoid, minimize, or compensate for loss of riparian habitat.

Impacts on western spadefoot and federally listed vernal pool invertebrates are mitigated through implementation of Mitigation Measures 4.4-3a, which requires surveys for western spadefoot in suitable habitat and collection and relocation of western spadefoot and their egg masses to suitable habitat that will be preserved in perpetuity, and Mitigation Measure 4.4-3b, which requires compensation for loss of vernal

pool invertebrate and western spadefoot habitat in such a manner that that there will be no net loss of habitat. Mitigation Measure 4.4-a would mitigate impacts on valley elderberry longhorn beetle in the absence of the PCCP, by requiring surveys for elderberry shrubs and avoidance of or compensation for valley elderberry longhorn beetle habitat according to the U.S. Fish and Wildlife Service 2017 Framework. Impacts on special-status reptile, bird, and mammal species are mitigated through implementation of Mitigation Measures 4.4-5a, 4.4-5b, 4.4-5c, 4.4-5d, and 4.4-5e, which would require surveys for and avoidance of individuals, nests, occupied roosts, or other active breeding sites of special-status reptile, bird, and mammal species (western pond turtle, burrowing owl, loggerhead shrike, white-tailed kite, northern harrier, Swainson's hawk, tricolored blackbird, song sparrow, grasshopper sparrow, pallid bat, Townsend's big-eared bat, and American badger), and compensation for any unavoidable loss of occupied burrowing owl habitat and Swainson's hawk foraging habitat.

Therefore, alternative mitigation is presented for each biological resource impact in the event the PCCP is not available as a mitigation strategy. In most cases, these mitigation measures, like participation in the PCCP, would reduce significant impacts to a less-than-significant level. SAP policies and Mitigation Measures 4.4-1a, 4.4-1b, 4.4-3a, 4.4-3b, and 4.4-3c are expected to reduce significant impacts on wetlands and other waters of the United States, waters of the state, and federally listed vernal pool invertebrates, but not necessarily to a less-than-significant level. While these measures would result in "no net loss" of overall wetland acreage, there may not be enough mitigation bank credits available on the market to fully offset the loss of wetland functions resulting from project implementation, and it is unknown if sufficient land would be available from willing sellers to fully mitigate the loss. Therefore, as described in the Draft EIR, these impacts would remain significant and unavoidable. If the PCCP is approved by the state and federal agencies and is adopted and implemented in time to support development within the PRSP and net SAP areas, it would likely reduce significant impacts to a greater degree than project-by-project mitigation by developing a large, managed and monitored reserve area that will provide wetland and species habitat restoration, open space and agricultural conservation in perpetuity, rather than smaller, more fragmented and isolated reserves surrounded by urban development.

3.1.4 Master Response 4: Odors

ODOR IMPACT THRESHOLDS OF SIGNIFICANCE

An issue was raised in public comment on the Draft EIR that the result of one of the studies in Draft EIR (Appendix J, SCS Engineers Odor Studies) describes odor impacts in terms of the number of times that the dilutions to threshold (DT) metric is exceeded. To clarify, the DT metrics referenced in Appendix J are not used in the Draft EIR as significance thresholds under CEQA. State CEQA Guidelines Section 15064.7 describes a threshold of significance as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant." The Draft EIR on page 4.3-50 contains an explanation of the dilutions to threshold metrics and how they are used in the Draft EIR:

> Intensity of odor impact is often expressed in terms of dilutions to threshold (D/T or DT), which defines odor in terms of how much fresh air would have to mix with the odorous air such that half of the population could no longer detect the odor. The unit DT can also be thought of as the detection threshold (DT). Odor is considered likely to be offensive when it exceeds 10 DT, may be offensive when it exceeds 8 DT, and is sometimes offensive when it exceeds 5 DT. While these values have been used by some entities as nuisance standards and as design values in odor modeling, odor impacts are still subjective and highly variable. Neither Placer County nor PCAPCD has adopted nor subscribes to any specific scheme of odor standards or thresholds.

Therefore, the Draft EIR does not use exceedances of a numeric threshold in making a significance determination for odor impacts. This approach is widely accepted: Rather than relying on a numeric

threshold solely based on concentrations or levels of odor, a more holistic evaluation is the norm for determining significance under CEQA. For example, the City of San Diego guidance states that "the significance of potential odor impacts should be based on what is known about the quantity of the odor compound(s) that would result from the project's proposed use(s), the types of neighboring uses potentially affected, the distance(s) between the project's point source(s) and the neighboring uses such as sensitive receptors, and the resultant concentration(s) at the receptors" (City of San Diego Development Services Department 2011). The San Joaquin Valley Air Pollution Control District's recommended threshold for odor is "[b]ased on distance of odor source from people and complaint record for [the] facility or [a] similar facility." The threshold is "[m]ore than one confirmed complaint per year averaged over a three-year period, or three unconfirmed complaints per year averaged over a three-year period" (SJVAPCD 2012). The Sacramento Metropolitan Air Quality Management District states that "[d]ue to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact," and "Lead Agencies should consider all available pertinent information…to qualitatively determine if a significant odor impact could potentially occur" (SMAQMD 2016). Finally, the South Coast Air Quality Management District threshold for odor is whether the project creates an odor nuisance pursuant to SCAQMD rules (SCAQMD 2019).

The Draft EIR's standard of significance for a significant odor impact, as noted on page 4.3-21, is whether the project would create an objectionable odor affecting a substantial number of people. The Draft EIR contemplates the findings of the study in Appendix J in determining whether the impact would be significant. Draft EIR page 4.3-50 presents the following study findings:

- Project-generated waste processed and disposed of at WRSL would contribute to odor impacts in the vicinity.
- The project would cause the number of exceedances of specific odor levels (likely offensive, may be offensive, and sometimes offensive) to increase.
- The project would, at its peak, conservatively represent 16 percent of the odor currently generated at WRSL. At the time of landfill closure in 2058 (assuming, conservatively, buildout of the project over 20 years), it would represent approximately 8 percent of odor emissions.

Therefore, considering the conclusions of the studies in Appendix J, the Draft EIR concludes on page 4.3-50 that this impact would be significant.

ODOR CONTROL MITIGATION

Several commenters listed mitigation measures they thought should be evaluated in the Draft EIR, including payment of a fair share for odor control at the WRSL, development of a biosolids and wood waste processing facility, improved leachate management, and increasing capture efficiency of landfill gas. The Draft EIR identifies feasible measures to reduce odor impacts. On page 4.3-52, the Draft EIR states:

> While mitigation for odor issues would be beyond the control of Placer County, feasible measures are available to WPWMA, which owns and operates WRSL and MRF, including composting operations. WPWMA is already engaged in assessment, research, and pilot studies designed to minimize odors to the degree feasible. The following are examples of measures that either have been, or can and should be, adopted by WPWMA (CEQA Statute Section 21081; State CEQA Guidelines Section 15091):
>
> - **Implement Revised Composting Methodology.** To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology, consisting of either aerated static pile (ASP) technology; covered (CASP) technology, in which ASPs are covered with an organic or synthetic cover; and/or partial or total enclosure of the composting operation. If CASP technology is employed, VOC emissions could be reduced by approximately 72 percent, substantially reducing objectionable odors (SCS Engineers 2018:18).

- **Minimize Use of Fines as Alternative Daily Cover.** Use of fines derived from municipal solid waste (MSW) and the materials recovery facility (MRF) as alternative daily cover (ADC) can generate more objectionable odors than the MSW waste stream because of its large surface area and potential to generate odorous gases. To reduce odors associated with composting operations, WPWMA can and should minimize use of fines as ADC to the degree feasible, and should cover MRF and MSW fines with MSW, soil, or other daily cover to reduce odor emissions from fines used overnight as ADC.
- **Immediately Cover or Bury Sludge Waste.** To reduce odors associated with sludge received by WRSL from the Roseville Wastewater Treatment Plant (WWTP), WPWMA can and should immediately cover or bury sludge waste. This practice can prevent sludge from off-gassing for extended periods and reduce odorous emissions that may migrate offsite.

The Draft EIR further explains on page 4.3-52 that "because these specific measures are beyond the jurisdiction of Placer County, and because the nature, degree, and effectiveness of future odor control measures that may be implemented by WPWMA are unknown, odor impacts resulting from the project would be **significant and unavoidable**."

In further response to the Draft EIR and as a result of continued engagement with Placer County, WPWMA retained a consultant to identify and prioritize odor reduction measures at WRSL, and estimate costs for their implementation, and ongoing operation and maintenance. (See Technical Report #2, prepared by CE Schmidt and TR Card on August 2, 2019, included as Appendix I.) Technical Report #2 describes odor control/response measures for four major areas of landfill operation and activity: (1) compost operations, (2) landfill operations, (3) materials recovery facility (MRF), and (4) site-wide technologies and operations. Measures are categorized into four implementation tiers, prioritized by effectiveness at odor reduction and estimated implementation costs for each measure.

Authority staff, working with the Technical Report consultants, further refined and prioritized the measures, and proposed a package of measures that would achieve up to a 90 percent reduction in odor emissions. These measures are detailed in correspondence from Robin R. Baral, Churchwell White, LLP, on behalf of the Authority, dated August 22, 2019 (Appendix I).The letter promotes specific Tier 1 and Tier 2 measures—those deemed most effective—for composting, landfill, and site-wide operations, but notes that Tier 3 and Tier 4 measures, because of their marginal benefit and significant implementation costs, are not proposed. Similarly, the Authority does not propose many of the mitigation measures related to the MRF, as they would not be cost-effective, and MRF contributions to overall odor emissions are relatively insignificant (R. Baral, personal communication, August 22, 2019).

Tier 1 measures proposed by the Authority for composting operations include positive aerated static piles (ASP) and associated Best Management Practices (BMPs), annual odor emissions testing, and construction of a mixing building (within which food waste would be received and blended with green waste) fitted with a biofilter for scrubbing ventilated air. While the Authority notes that it is already planning to implement ASP (a measure also described and recommended in the Draft EIR), it suggests that BMPs would be required as an additive measure to ensure that the desired level of odor reduction is achieved. Tier 2 measures for composting operations include implementing ASP on cured compost, increased and improved aeration of the leachate treatment ponds, and monthly odor testing to identify issues with the Tier 1 BMPs and any other needed operational changes.

Tier 1 measures proposed by the Authority for landfill operations address both the active landfill face and the inactive landfill/gas collection operations. The former includes application of odor neutralizers to sorted refuse and to the active landfill face, and additional landfill BMPs (such as limiting the size of the active face). Those for the inactive landfill/gas collection include increased screening to identify and repair landfill gas "hot spots," and optimize well field density and configuration, and enhanced landfill gas collection. Tier 2 measures for landfill operations include use of Posi-Shell landfill cover (or equivalent), which forms a protective crust over the landfill; use of foam or other odor neutralizer for continuous cover of the active landfill face; and additional landfill gas monitoring.

Site-wide technologies and operations related to odor control and management are also proposed by the Authority. Measures include enhanced monitoring through placement of odor sensors in the PRSP area, establishing an odor hotline, community outreach by the Authority's landfill operator, and planting trees with aromatic foliage around the WRSL perimeter.

Capital costs and annual maintenance costs for Authority-proposed measures are shown in Table 3-6.

Table 3-6 Authority-Recommended Odor Mitigation Measures

Measure	Capital Cost	Annual Cost
Tier 1 Measures: Composting Operations		
Aerated Static Piles	Authority funded	Authority funded
Compost Best Management Practices	$0.00	$100,000
Annual Odor Emissions Testing	$0.00	$100,000
Mixing Building with Biofilter Scrubber	$2,000,000	$0.00
Tier 2 Measures: Composting Operations		
ASP on Cured Compost	$2,500,000	$0.00
Improved Pond Aeration	$200,000	$10,000
Odor Testing and Operational Revisions	$0.00	$100,000
Tier 1 Measures: Landfill Operations		
Odor Neutralizers for Sorted Refuse	$200,000	$120,000
Odor Neutralizers for the Active Landfill Face	$200,000	$120,000
Landfill BMPs	$0.00	$100,000
Increased Screening	$0.00	$200,000
Enhanced Landfill Gas Collection	$0.00	$200,000
Tier 2 Measures: Landfill Operations		
Posi-Shell Landfill Cover	$0.00	$200,000
Odor Neutralizer for Continuous Cover of the Active Landfill Face	$0.00	$200,000
Additional Landfill Gas Monitoring	$0.00	$50,000
Tier 1 Measures: Site-wide Technologies and Operations		
Enhanced Monitoring/Modeling	$200,000	$0.00
Odor Hotline/Community Outreach	$20,000	$100,000
Tree Planting and Maintenance	$500,000	$25,000

Sources: Technical Report #2, prepared by CE Schmidt and TR Card on August 2, 2019; R. Baral, personal communication, August 22, 2019

All told, Tier 1 measures are estimated to cost $3,120,000 for new capital facilities and $1,065,000 in annual operational costs and would reduce odor emissions at the WRSL by approximately 70 percent compared to existing baseline conditions, and 35 percent compared to estimated 2058 conditions, the projected year of landfill closure and conservative estimate of project buildout. Tier 2 measures would cost $2,700,000 in new capital facilities and $560,000 in annual operational costs and would reduce odor emissions at the WRSL by approximately 18 percent compared to existing baseline conditions, and 9 percent compared to estimated 2058 conditions. Combined, Tier 1 and Tier 2 measures would require $5,820,000 in new capital expenditures and $1,625,000 in annual operation and maintenance costs. The Authority expresses confidence that collectively, these measures would achieve odor emissions reductions of up to 90 percent compared to existing baseline conditions and up to 50 percent compared to conditions in 2058, reducing cumulative odor impacts to less-than-significant levels.

While WPWMA characterizes the slate of Tier 1 and Tier 2 measures as "the Authority's proposed odor mitigation measures for the Sunset Area Plan/Placer Ranch Specific Plan Draft EIR," it would be neither feasible nor reasonable that costs for all Authority-proposed odor reduction measures be borne by the project. As described in the Draft EIR at pages 4.3-6 through 4.3-11, objectionable odors are currently generated at WPWMA facilities, odor complaints are regularly lodged, and odors are an existing issue. Moreover, residents and businesses in the project area, like others around the landfill, will pay garbage collection fees, recycling fees, and applicable tipping fees to WPWMA to support landfill operations, including odor control.

Although Placer County has not independently verified the efficacy or cost estimates of measures proposed by WPWMA, it acknowledges that, by virtue of the Authority's comprehensive assessment of odor control measures necessary to reduce odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to the 2058 estimate, and their costs, the Authority has developed the foundation for potential odor reduction mitigation applicable to the SAP/PRSP project area and other areas that may be subject to objectionable odors from the facility, and to which the project could contribute. Upon development of a methodology to apportion fair-share costs to regional development and agreement by participating entities to participate in mitigation funding, WPWMA will have the ongoing revenue necessary to implement, operate, and maintain its proposed slate of Tier 1 and Tier 2 measures to achieve the stated goal.

Even in the absence of an existing or foreseeable WPWMA fee program, Placer County recognizes its responsibility to mitigate for odor impacts resulting from additional waste generation and the reduced buffer to the extent it is feasible to do so both from a land use and a CEQA perspective. As to the land use policies, the County in consultation with WPWMA representatives has made the following revisions to the proposed General Plan and SAP Development Standards:

The GPA Buffer proposal will be modified *from* what was proposed in the December 2018 SAP: 2,000 feet with a footnote stating that the buffer could be reduced to 1,000 feet with approval of a specific plan, master plan or development agreement, *to*: 2,000 feet with a footnote stating that new residential uses beyond 2,000 feet but within 1 mile of the landfill property boundary require approval of a specific plan, master plan, or development agreement. A footnote will also be included in the SAP policy document (in addition to the General Plan) and will reference the SAP development standards section.

The SAP development standards will be augmented to require:

(a) recordation of landowner acknowledgment/notice of proximity of landfill and potential odors, and

(b) fair-share payment to WPWMA for Tier 1 capital improvements for odor control, as stipulated in development agreements. The fair-share payment shall be based on the proportion of the total SAP/PRSP residential unit capacity represented by the new residential units in a given project. Payment shall be remitted at building permit issuance.

(Note: Commercial and recreational uses within buffer distances of 1,000 feet and 500 feet, respectively, may still be considered on a case-by-case basis with approval of a specific plan, master plan, or development agreement [See Draft EIR Exhibit 3-27 and Placer County General Plan Table 1-5, which have both been revised as shown in Chapter 2, "Revisions to the Draft EIR"; and SAP Table 1-3].)

To determine a fair-share mitigation cost, the County first considered the estimated proportion of the waste stream to be contributed by project development at buildout, and thus, overall odor attributable to the project. As summarized on pages 4.3-49 and 4.3-50 of the Draft EIR and described in greater detail in the September 27, 2018 study by SCS Engineers, "Evaluation of Incremental Odor Increase from Western Regional Sanitary Landfill" (Draft EIR Appendix J), the project would, at its peak, conservatively represent 16 percent of the odor currently generated at WRSL and, at the time of landfill closure in 2058 (conservatively assuming buildout of the project over 20 years), approximately 8 percent of odor emissions (see Table 5, SCS Engineers 2018, Draft EIR, Appendix J). The estimate by SCS assumes no change in odor management practices at WRSL.

The County then considered the costs for Tier 1 measures (not including ASP, which the Authority plans to implement), which include those for landfill, composting, and site monitoring operations, in determining the project's fair-share contribution. The aforementioned WPWMA correspondence identifies that Tier 1 measures (including aerated static pile/compost best management practices, annual odor emissions testing, mixing building with biofilter scrubbing, and active landfill face and inactive landfill/gas collection measures) would reduce sitewide odor emissions by approximately 70 percent when compared to existing baseline, and by 35 percent when adjusted to estimated 2058 conditions (R. Baral, personal communication, August 22, 2019), over four times the levels attributable to the entirety of the proposed project.

Next, the County considered the fair share to be linked to the number of residential units that could be located in the Sunset Area as a whole, and between the Authority and the County, devised a fair share apportionment of the non-Authority-funded Tier 1 costs for each residential project proposed within the zone between 2,000 feet and 1 mile from the landfill boundary. This apportionment is based on the number of residential units proposed in a given residential project and the proportion of total capacity that number represents. Therefore, as a partial compensatory measure, Placer County will require the non-Authority-funded Tier 1 improvement costs to be apportioned between PRSP, net SAP, and other future projects as follows:

The fair share payment of the non-Authority-funded Tier 1 capital improvements (estimated at $3,120,000) is to be apportioned over projects with residential units in the SAP/PRSP area that are proposed in the zone between 2,000 feet and 1 mile from the landfill property, measured from the landfill property boundary. The following calculates the fair-share payment for PRSP and identifies the future fair-share payment obligation for the net SAP area.

Fair share payment for PRSP is estimated at $2,172,513 based on a total of 5,636 residential units (approximately 70 percent of the residential capacity of the project as a whole). Payment will be apportioned by residential units (not including university housing) and the first 2,154,879 square feet of non-residential uses (over a 30-year absorption period). Payment will be required upon issuance of the building permit.

The fair share payment for the net SAP area is estimated at $947,487. Payment will be apportioned by residential units in future projects proposed in the zone between 2,000 feet and 1 mile from the landfill, measured from the landfill property boundary. Payment shall be required upon issuance of the building permit. Residential unit capacity in the Net SAP totals 2,458, or approximately 30 percent of the residential capacity of the project as a whole. The payment obligation is triggered by future projects and is not a present obligation of the County.

The Authority also requested that Placer Ranch project proponents pay an annual contribution to WPWMA for maintaining the Tier 1 facilities in the amount of $1,050,000. It is the County's position that ongoing operation and maintenance of odor-control equipment and odor-reduction programs should be funded through revenue generated by the Authority from regular sources: garbage collection fees, recycling fees, and applicable tipping fees paid by ratepayers, including future residents and business owners in the project area. However, PRSP has agreed to a good-faith, one-time payment of approximately $290,000 toward operation and maintenance costs for odor control measures. When added to the $3,120,000 for capital expenditures for odor control described above, it can be reasonably determined that the payment is sufficient to mitigate for odor impacts associated with reducing the existing buffer.

Therefore, in response to comments received by the Authority and others, the County has revised the Draft EIR to include mitigation that identifies and prioritizes the odor improvement measures identified by the Authority, many of which are also described in the Draft EIR and in comment letters, as described above. The Draft EIR has also been revised to explain that although a fee program does not currently exist to implement the Authority-proposed odor-reducing actions identified in Mitigation Measure 4.3-6a, WPWMA has created the foundation of such a program, and can and should apply a reasonable methodology to apportion costs for any additional needed capital investments (beyond those funded by the project) and ongoing operation and maintenance to create a bona fide fee program. In advance of such a program, PRSP project

proponents will make a one-time, good-faith monetary contribution to Tier 1 maintenance in the amount of approximately $290,000, which will be apportioned by residential units (not including university housing) and to the first 2,154,879 square feet of non-residential uses (over a 30-year absorption period). Payment will be required upon issuance of the building permit. Upon development of a fee program by WPWMA, the County will require other proponents of projects within the net SAP area to contribute in accordance with established methodologies.

The discussion titled, "Mitigation Measures," on pages 4.3-51 through 4.3-52 of the Draft EIR is revised as follows:

Mitigation Measures

Reducing the 1-mile buffer around WRSL to accommodate development is an element of the proposed project. One approach to mitigation, as stated in the State CEQA Guidelines Section 15370, is to avoid the impact altogether by not taking a certain action or parts of an action. Placer County acknowledges that maintaining the 1-mile buffer, which would be a feature of the no-project alternative (see Chapter 6, "Project Alternatives") would reduce impacts by reducing the exposure of people to objectionable odors. However, after careful consideration, Placer County has determined that this measure would prevent the County from achieving its project objectives to provide for diversity of development in the project area (including postsecondary education facilities and employment-generating uses and associated residential development), provide a diversity of housing types, create a balanced mix of land uses, establish a site for a CSU, meet the County's regional housing needs allocation, ensure economic viability, and achieve consistency with the Sacramento Region Blueprint.

~~Another common approach to mitigating regional issues involves establishment of a regional mitigation fee program whereby fees are collected on a pro-rata basis from program beneficiaries and then spent on meaningful improvements that specifically reduce the impact in question. Placer County considered the merits of such a program to address odor impacts of the project but determined that establishment of a mitigation fee program would be infeasible. To establish such a program, performance standards would need to be developed to determine program objectives; specific improvements that would achieve the standards would need to be identified; cost estimates for construction, operation, and maintenance of those improvements would need to be developed; the type and geographic scope of fee program participants would need to be established; the pro-rata share per given development unit would need to be defined; and administrative processes and procedures would need to be crafted. Because there is no program currently in place; odor impacts are subjective, highly variable, and weather dependent; and because odor management and abatement are the responsibility of WPWMA, this mitigation approach would be infeasible.~~

While direct mitigation for odor issues would be beyond the control of Placer County, feasible measures are available to WPWMA, which owns and operates WRSL and MRF, including composting operations. WPWMA is already engaged in assessment, research, and pilot studies designed to minimize odors to the degree feasible. The following ~~are examples of~~ mitigation measure~~s either have been, or~~ can and should be~~,~~ adopted by WPWMA (CEQA Statute Section 21081; State CEQA Guidelines Section 15091):

Mitigation Measure 4.3-6a: Implement odor-reducing measures at the Western Regional Sanitary Landfill

WPWMA developed a slate of odor reduction measures it estimates will reduce WRSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058, the projected year of landfill closure and conservative estimate of project buildout. Measures apply to composting operations, landfill operations, and site-wide technologies and operations. Capital costs and costs for ongoing operation and maintenance of the measures were also estimated. (See Technical Report #2, prepared by CE Schmidt and TR Card, dated August 2, 2019, and correspondence from Robin R. Baral, Churchwell White, LLP, on behalf of the Authority, to Clayton Cook, Placer County Counsel, dated August 22, 2019.)

These measures, while not expressly proposed by WPWMA as the basis of a regional mitigation fee program, could logically serve that function. To develop a program, the Authority can and should take the additional steps to determine the type and geographic scope of fee program participants, the pro-rata share per given unit of development, and processes and procedures to administer the program. Based on information provided by WPWMA, the specific odor-reducing measures to be implemented under the program could include:

- **Implement Aerated Static Pile (ASP) Technology and Compost Best Management Practices (Tier 1, Composting Operations)**. To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology consisting of aerated static pile (ASP) technology in which air flow is induced through the material without turning or mixing. According to WPWMA, implementation of this measure is already planned for implementation. To ensure optimal odor reduction, best management practices (BMPs, e.g., anaerobic digestion of food waste) and training are also needed.

- **Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations)**. To ensure maximum composting odor reduction, odor emissions testing is required on an annual basis to monitor odors and implement appropriate response is target reductions are not being achieved.

- **Construct and Operate a Mixing Building with Biofilter (Tier 1, Composting Operations)**. To reduce odors associated with food waste composting, a mixing building fitted with a biofilter for air scrubbing should be constructed. The building would be a relatively small structure within which food waste would be received, blended with shredded green waste, then transferred to the ASP system where it would undergo controlled composting.

- **Apply Odor Neutralizers to Sorted Refuse (Tier 1, Landfill Operations)**. To reduce landfill-related odor emissions, odor neutralizers should be applied to sorted refuse between transfer from the materials recovery facility (MRF) to the landfill site. This measure involves initial implementation of a spray system and ongoing application of neutralizer.

- **Apply Odor Neutralizers to Active Landfill Face and Implement BMPs (Tier 1, Landfill Operations)**. To reduce landfill-related odor emissions, odor neutralizers should be applied to the active landfill face. Like that for sorted refuse, this measure involves initial implementation of a spray system and ongoing application of neutralizer. BMPs, such as limiting the size of the active landfill face, would optimize odor neutralizer operations.

- **Increase Screening of Landfill Gas and Implement Response Actions (Tier 1, Landfill Operations)**. Quarterly screening for fugitive landfill gas should be conducted to identify "hot spots" of landfill gas emissions through interim and final landfill covers. Such screening would reduce the time between identification and repair of surface hot spot emissions, and thus odor.

- **Enhance Landfill Gas Collection (Tier 1, Landfill Operations)**. To reduce landfill-related odor emissions, WPWMA should establish stricter protocols for landfill gas collection. Because landfill gas must be used, flared, or stored in a leak-free container, minimizing odorous emissions would involve operating the system for maximum containment of gas rather than maximum cost-effective performance of the gas-to-energy system.

- **Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies and Operations)**. To monitor odor emissions in areas around the WRSL, odor sensors should be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the Authority's dispersion modeling capabilities should also be implemented to better predict the nature, location, and intensity of odor issues.

- Establish Odor Hotline and Implement Community Outreach (Tier 1, Site-wide Technologies and Operations). An odor hotline should be established to allow the public ready access to WPWMA staff who will receive community complaints and concerns, and to provide timely response actions.

- Establish Tree-lined Perimeter of WRSL (Tier 1, Site-wide Technologies and Operations). Trees with aromatic foliage, such as pine or eucalyptus, should be planted around WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility.

- Implement Compost Curing Controls (Tier 2, Composting Operations). To further reduce compost-related odor emissions, ASP techniques, described above for raw compost, can and should be used on cured compost.

- Improve Pond Aeration (Tier 2, Composting Operations). Leachate collected from composting activities is rich in organic compounds and therefore odorous, especially in anaerobic conditions. To further reduce odor emissions from the ponds, leachate should be aerated to increase aerobic digestion of organic compounds and reduce fugitive odors.

- Implement Monthly Odor Testing and Response Actions (Tier 2, Composting Operations). Monthly odor testing should be implemented to ensure odor reduction measures for active and cured compost are functioning as expected and to implement corrective actions as needed.

- Apply Posi-Shell Landfill Cover (Tier 2, Landfill Operations). Posi-Shell is an enhanced form of landfill cover that uses a blend of clay, fibers, and polymers to produce a spray-applied mortar that dries in the form of a thin durable stucco. Posi-Shell, or similar membrane cover, should be applied to reduce landfill-related odor emissions.

- Implement Continuous Cover on Active Landfill Face (Tier 2, Landfill Operations). Odor-neutralizing foam or similar product should be used on the active landfill face during fill operations to reduce landfill-related odor emissions.

- Conduct Additional Landfill Gas Monitoring and Implement Response Actions (Tier 2, Landfill Operations). Additional monitoring should be conducted to ensure that landfill gas leaks and emissions are not occurring in the above-ground system during gas collection and response actions implemented to correct such leaks if they are discovered.

- ~~Implement Revised Composting Methodology. To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology, consisting of either aerated static pile (ASP) technology; covered (CASP) technology, in which ASPs are covered with an organic or synthetic cover; and/or partial or total enclosure of the composting operation. If CASP technology is employed, VOC emissions could be reduced by approximately 72 percent, substantially reducing objectionable odors (SCS Engineers 2018:18).~~

- ~~Minimize Use of Fines as Alternative Daily Cover. Use of fines derived from municipal solid waste (MSW) and the materials recovery facility (MRF) as alternative daily cover (ADC) can generate more objectionable odors than the MSW waste stream because of its large surface area and potential to generate odorous gases. To reduce odors associated with composting operations, WPWMA can and should minimize use of fines as ADC to the degree feasible, and should cover MRF and MSW fines with MSW, soil, or other daily cover to reduce odor emissions from fines used overnight as ADC.~~

- ~~**Immediately Cover or Bury Sludge Waste.** To reduce odors associated with sludge received by WRSL from the Roseville Wastewater Treatment Plant (WWTP), WPWMA can and should immediately cover or bury sludge waste. This practice can prevent sludge from off-gassing for extended periods and reduce odorous emissions that may migrate offsite.~~

The following mitigation measure is within the authority of Placer County and shall be implemented:

Mitigation Measure 4.3-6b: Require fair-share contribution to WPWMA for odor mitigation

As described in the Draft EIR at pages 4.3-6 through 4.3-11, objectionable odors are currently generated at WPWMA facilities, odor complaints are regularly lodged, and odors are an existing issue. It would be neither feasible nor reasonable for all odor mitigation costs to be borne by the proposed project. Therefore, based on the Authority-proposed measures, their costs, and a reasonable methodology to determine a fair-share contribution, Placer County shall require the proponents of the Placer Ranch Specific Plan to contribute a total payment of $2,465,273 to the Western Placer Waste Management Authority for purposes of funding odor reduction measures that will reduce odor impacts resulting from development within the Placer Ranch Specific Plan area.

The payment required of Placer Ranch Specific Plan proponents is based on: (1) the cost of non-Authority-funded Tier 1 odor control measures, apportioned by the number of residential units that could be developed in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary, and (2) a fair-share proportion of annual maintenance costs converted to present value over a 30-year absorption period, also apportioned by non-university residential units. Because odors are an existing issue, and because the entire project (PRSP and net SAP) would conservatively generate approximately 16 percent of odorous emissions compared to baseline conditions and 8 percent of odorous emissions in 2058 (estimated year of landfill closure and conservative estimate of project buildout), the proposed contribution for both capital expenditures and maintenance costs is considered conservative, that is, it more than compensates for the impact of the project. Costs include $2,172,513 in capital investment, plus approximately $290,000 for a one-time, good-faith contribution to operation and maintenance costs of the measures over a 20-year period. (The details and assumptions involved in the calculation of capital funding are described in greater detail in Master Response 4: Odors of the Final EIR.)

In addition to the fair-share contribution for odor mitigation required of PRSP, Placer County will require fair-share contribution by other future residential developments proposed in the net SAP area in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. Based on the Authority's comprehensive assessment of odor control measures, their efficacy, and costs, it is expected that WPWMA can and should develop a bona fide regional fee program to which proponents of regional development projects will contribute to implement, operate, and maintain odor control measures.

Significance after Mitigation

As noted above, WPWMA is engaged with the community regarding odor management, is assessing the viability of odor-reducing approaches through pilot studies and is actively planning facility and operational improvements as part of its Renewable Placer Waste Action Plan to address regional growth, regulatory requirements, and other goals and objectives, including odor control. WPWMA's identified odor reduction actions (Mitigation Measure 4.3-6a) are estimated to reduce WRSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058. However, the State CEQA Guidelines state that "[m]itigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments" (Section 15126.4[a][2]). Because direct implementation of the actions listed in Mitigation Measure 4.3-6a are beyond the jurisdiction of Placer County, they are infeasible for the County to implement. Fair-share contribution to such measures is the County's responsibility to enforce, however, and Mitigation Measure 4.3-6b would require a monetary contribution by Placer Ranch Specific Plan proponents and by future net SAP area developments to WPWMA for their odor impacts, and participation by other

> projects, as applicable, in a regional mitigation fee program that can and should be developed by WPWMA for additional odor control measures and ongoing operation and maintenance. However, because ~~these specific measures are~~ full implementation of the odor control measures proposed by WPWMA is beyond the jurisdiction of Placer County, and because the nature, degree, and effectiveness of ~~future~~ odor control measures that may ultimately be implemented by WPWMA are unknown, odor impacts resulting from the project would be **significant and unavoidable**.

State CEQA Guidelines Section 15088.5(a) indicates recirculation "when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review…but before certification." Section 15088.5(a)(3) indicates that recirculation is required if "[a] feasible…mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it." As described above and in the revisions to the Draft EIR, Mitigation Measure 4.3-6a is not feasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, it would not reduce the impact to a less-than-significant level and, importantly, Placer County intends to adopt the measure. Therefore, the mitigation measures are not considered "significant new information," and recirculation is not required.

LAND USE COMPATIBILITY

The City of Rocklin commented that the revised buffer zone standards will not adequately protect the WRSL. The City requests that the discussion acknowledge that the project would introduce new sensitive land uses near the WRSL. The City further states that given the buffer distance specified in General Plan Policy 4.G.11, the reduced buffer is incompatible with the County's existing General Plan. Ultimately, the City requests that there be additional mitigation measures. WPWMA commented that the proposed buffer zone policy is inconsistent with the Placer County General Plan and that there is no reference to a landfill conservation easement requirement (per Placer County General Plan, Part 1, Land Use/Circulation Diagrams and Standards) in the Draft EIR. WPWMA also states that the Draft EIR does not discuss how the buffer reduction should be reconciled with the mandatory provision to conserve buffer zone land. WPWMA suggests more or functionally equivalent mitigation measures to reduce land use conflicts with the WRSL.

The "Land Use Buffer Zone Standards" section on page 18 in the County's General Plan notes:

> This General Plan requires the use of buffer zones in several types of development. While the exact dimensions of the buffer zones and specific uses allowed in buffer zones will be determined through the County's specific plan, land use permit, and/or subdivision review process, buffer zones must conform to the following standards (as illustrated conceptually in Figures 1-3 through 1-6); provided, however, different buffer zone standards may be established within a Specific Plan as part of the Specific Plan approval.
>
> This language clearly states that the buffers outlined in the General Plan Land Use Buffer Zone Standards are to be considered, applied, and determined through project review and that different buffer zone standards may be established within a Specific Plan. To that end, the PRSP and any future specific plan proposed within the Sunset Area may propose buffer zones that differ from what is illustrated in the General Plan.

The assertion that the project's proposal to modify the General Plan sanitary landfill buffer zone is inconsistent with the "Buffer Zone Preservation" provision contained within the Land Use Buffer Zone Standard section of the General Plan is incorrect. As outlined above, when applying buffer zone standards through project review, the first step is to assess what buffer applies to the project. Following that determination and application of the applicable buffer zone for a project, the relevant buffer zone standards and related provisions contained within the Land Use Buffer Zone Standard section of the General Plan are then required to be "reserved and guaranteed in perpetuity through land acquisitions, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent

proposed development projects providing the necessary funding." The purpose of this provision is to protect and memorialize the established buffer zone after it has been applied to a project. Therefore, the project's proposal to modify the sanitary landfill buffer zone is not inconsistent with this provision.

Notwithstanding, in response to questions and concerns, the proposed project no longer includes the potential for a buffer of less than 2,000 feet between residential uses and a solid waste disposal site and, for residential projects proposed in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary, a specific plan, area plan or development agreement will be required, as will adherence to the SAP development standards identified in this response. Commercial and recreational uses within buffer distances of 1,000 feet and 500 feet, respectively, may still be considered on a case-by-case basis with approval of a specific plan, master plan, or development agreement [See Draft EIR Exhibit 3-27 and Placer County General Plan Table 1-5, which have both been revised as shown in Chapter 2, "Revisions to the Draft EIR"; and SAP Table 1-3].

The Draft EIR requires implementation of Mitigation Measure 4.10-2 to reduce land use compatibility impacts. Mitigation Measure 4.10-2 requires odor control measures for specific plans, master plans, and development agreements for development within the PRSP area and net SAP area. These measures could include locating air intakes on the sides of buildings most distant from the WRSL; requiring a level of air filtration that exceeds Title 24 standards; and requiring written disclosures to initial and subsequent prospective buyers, lessees, and renters of properties. As described previously under "Odor Control Mitigation," additional mitigation has been added in response to comments received on the Draft EIR. Mitigation Measure 4.3-6a recommends implementation of odor control measures at the WRSL and Mitigation Measure 4.3-6b would require a fair-share contribution to WPWMA odor mitigation. To reflect the new mitigation measures added in Section 4.3, "Air Quality," to reduce objectionable odors, the first paragraph on page 4.10-18 of the Draft EIR is revised as follows:

> ## Mitigation Measures
>
> As described in detail in Section 4.3, "Air Quality," Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are available to mitigate odor impacts. Mitigation Measure 4.3-6a outlines measures proposed by WPWMA that should be implemented at the WRSL to reduce odors. Odor reduction measures include those pertaining to composting operations (e.g., ASP technology, odor emissions testing and response, mixing building with biofilter scrubbing), landfill operations (e.g., odor neutralizers, increased landfill gas screening and collection), and site-wide technologies and operations (e.g., enhanced monitoring and modeling, community outreach, and tree-lined perimeter). Mitigation Measure 4.3-6b would require a monetary contribution by the proponents of Placer Ranch Specific Plan to WPWMA for odor mitigation, and participation by future developers within the net SAP area who propose residential projects in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. The County will also consider participation by future projects in a regional odor mitigation fee program that can and should be developed by WPWMA. ~~measures available to Placer County to mitigate odor impacts (e.g., redesign of the proposed project, implementation of a regional mitigation fee program) would be infeasible, but feasible measures are available to WPWMA, which owns and operates WRSL and MRF, including composting operations. Such measures include revised composting methods, minimizing use of fines as alternative daily cover, and appropriate and timely handling of sludge waste (see Mitigation Measures subsection of Impact 4.3-6, Create objectionable odors affecting a substantial number of people).~~

As described on Draft EIR page 4.10-18, even with implementation of Mitigation Measure 4.10-2, impacts would remain significant because the "measure would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods and amount/type of waste." Impact 4.10-2 would therefore remain significant and unavoidable. In addition, as described above, Mitigation Measure 4.3-6a is infeasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of

odor control measures that may ultimately be implemented are unknown, so odor impacts remain significant and unavoidable. Therefore, the last paragraph on page 4.10-18 of the Draft EIR is revised as follows:

> **Significance after Mitigation**
> Mitigation Measure 4.10-2 would require implementation of measures in new development pursuant to proposed specific plans, master plans, or development agreements that would reduce perception of odor inside new structures and, to a lesser extent, outside new structures. These measures would potentially aide in increasing land use compatibility in the PRSP. However, this measure would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Mitigation Measure 4.3-6a and Mitigation Measure 4.3-6b are also available for reducing odors at the WRSL. However, Mitigation Measure 4.3-6a is infeasible for the County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown. Therefore, this impact would be **significant and unavoidable**.

State CEQA Guidelines Section 15088.5(a) indicates the need for recirculation "when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review…but before certification." Section 15088.5(a)(3) indicates that recirculation is required if "[a] feasible…mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it." As described above and in the revisions to the Draft EIR, Mitigation Measure 4.3-6a is not feasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown, and, importantly, Placer County intends to adopt the measure. Therefore, the mitigation measures are not considered "significant new information," and recirculation is not required.

EFFECTS ON WESTERN REGIONAL SANITARY LANDFILL OPERATION

Commenters cite other facilities, both specific and in general, as examples of instances in which legal or regulatory action has been taken against landfills due to odors. One commenter, for example, referenced Newby Island Resource Recovery Park and Sunshine Canyon Landfill as facilities where "encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities…." These actions have resulted in denials of expansion permits, significant financial ramifications, and abatement orders" (Comment 21-65). Another commenter claims "landfill expansions have constantly been the target of litigation, regardless of the investments made by those agencies, or their importance as assets to the community. Bringing additional residents closer to the landfill buffer will significantly increase the risk of additional lawsuits" (Comment 10-6).

First, it should be noted that several proposed policies are protective of the WRSL. The SAP contains Policy LU/ED-6.2, which states:

> When considering land use changes near the Western Regional Sanitary Landfill and the Western Placer Waste Management Authority Material Recovery Facility (MRF) operation, the County shall consider the regional value of these solid waste facilities and operations. To protect these facilities and operations from incompatible encroachment, as well as to protect new uses from nuisances generated by the landfill and MRF, new development shall be reviewed and approved on a project-by-project basis, considering proximity to the active operation of these facilities and predicated on the new development's ability to comply with the standards specified in Table 1-3 of this Plan.

SAP Policy LU/ED-6.3 states:

> The County shall encourage businesses that are compatible with WPWMA land uses, such as businesses focused on the collection and conversion of waste, including but not limited to recycling, biomass, and production of organics for composting and mulching to be located in the Eco-Industrial District.

SAP Policy NR-5.7 states:

> The County, in coordination with the PCAPCD, shall require the establishment of buffers and/or other appropriate mitigation on a project-by-project basis to provide for protection of sensitive receptors from sources of air pollution or odor.

The County agrees that bringing additional residents closer to the landfill could result in pressure for WPWMA to implement additional odor control measures. Impacts on the WRSL's operations are addressed in Draft EIR Impact 4.15-11. Impact 4.15-11 focuses on the potential impact on WRSL operations from incompatible land use, which may result in insufficient capacity to serve waste disposal needs. A portion of the analysis in Impact 4.15-11 refers to discussions under Impact 4.10-2; pages 4.10-16 and 4.10-17 under Impact 4.10-2 discuss Sunshine Canyon Landfill and Newby Island Resource Recovery Park in addition to three other facilities that have been the subject of complaints, lawsuits, and regulatory action in response to odor.

On Draft EIR page 4.10-16, it is noted that a settlement agreement for Newby Island Resource Recovery Park litigation in July 2016 does not require closure or preclude expansion of the facility, despite a commenter's claims in Comment 21-65 that actions have resulted in denial of expansion. For Sunshine Canyon Landfill, the other facility mentioned in Comment 21-65, Draft EIR page 4.10-16 describes an abatement order issued in March 2017 that prohibits large trash deliveries during certain hours, requires diversion of organic food waste, and requires better cover to control landfill gas emissions. Therefore, the Draft EIR recognizes that odor complaints can lead to real operational changes at landfills. Indeed, the Draft EIR concludes on page 4.10-17 that "[b]ased on these examples, it is likely that increased development in the vicinity of WPWMA's landfill will result in an increase in odor complaints which could lead to pressure for WPWMA to implement additional odor control measures."

To conclude with certainty which odor control measures would occur as a result of the project would be speculative and would not be reasonably foreseeable; therefore, they do not need to be evaluated under CEQA. Several sections of the State CEQA Guidelines are instructive on this issue. First, only indirect impacts that are reasonably foreseeable must be evaluated. Indirect impacts are those that are "not immediately related to the project, but [are] caused indirectly by the project" (Section 15064[d][3]). Second, "[a] change which is speculative or unlikely to occur is not reasonably foreseeable" (Section 15064[d][(3]). And, finally, State CEQA Guidelines Section 15145 states that "[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact."

Impacts of the project on WRSL operations would be considered indirect impacts. The proposed project could result in increased odor complaints, which could then result in complaints or other actions that could then result in operational changes at WRSL. CEQA therefore requires these impacts only be analyzed if they are reasonably foreseeable. Within the Impact 4.15-11 discussion, the Draft EIR refers to the discussion in Impact 4.10-2 for "a discussion of the range of potential operational changes that may result from increased odor complaints." In summary, these are:

- prohibiting large trash deliveries during certain hours,
- diverting organic food waste,
- improving the cover to control landfill gas emissions,
- improving gas collection and well efficiency and integrity,
- paying households within a certain distance,
- stopping green waste composting or reducing odors from it,

- avoiding turning greenery and compost on weekends, and
- using sprinklers for dust control.

Under Impact 4.15-11, the Draft EIR concludes that, "in the most extreme scenario, [increased odor complaints could] result in enforcement action to alter WRSL operations such that odors are reduced (e.g., changing the timing, volume, and manner of handling odorous materials, such as compost and green waste; implementing additional odor-control features and technologies)." The Draft EIR states that the "most extreme potential change in operations…would be diversion of waste to another facility…." In the same impact discussion, the Draft EIR notes that denial of future expansion plans is a "possible, although unlikely, outcome…." To determine which of these scenarios would happen as a result of the project would be speculative. Indeed, the Draft EIR concludes on page 4.15-64 that "these scenarios [of waste diversion and denial of future expansion plans], though possible, are not likely, and evaluation of potential impacts that could result from these scenarios would be speculative…." The conclusion that these impacts are speculative is consistent with the State CEQA Guidelines sections on indirect impacts and speculation described previously.

Although comment 10-6 the conclusion that the analysis of potential risks to expansion would be speculative is not supported by substantial evidence, the Draft EIR provides justification for this conclusion. In addition to the analysis quoted and described previously, on page 4.15-64, the Draft EIR states:

> As discussed in more detail in Section 4.10, "Land Use" (see Impact 4.10-2, "Consistency and compatibility with the Western Regional Sanitary Landfill), odor complaints related to land use inconsistency do not necessarily preclude landfill expansion. For example, although some operations of the Newby Island Recovery Park could be curtailed as part of a settlement agreement, the facility was still able to obtain a permit to expand. Additionally, despite odor complaints (many of which were eventually determined not to originate at the landfill), Chiquita Canyon Landfill was still allowed to expand. Therefore, based on existing and future operations at WRSL, and research into other similar facilities around the state, potential impacts on the WRSL and on waste disposal service would be **less than significant**.

The Draft EIR therefore explains why it is speculative to determine if the project would preclude expansion of the WRSL, relying on scenarios at two other landfills. To reflect the new mitigation measures added in Section 4.3, "Air Quality," to reduce objectionable odors and to also make it clear that waste diversion requirements would be speculative, the second paragraph on page 4.15-64 of the Draft EIR is revised as follows:

> As discussed in more detail in Section 4.10, "Land Use" (see Impact 4.10-2, "Consistency and compatibility with the Western Regional Sanitary Landfill), odor complaints related to land use inconsistency do not necessarily preclude landfill expansion. For example, although some operations of the Newby Island Recovery Park could be curtailed as part of a settlement agreement, the facility was still able to obtain a permit to expand. Additionally, despite odor complaints (many of which were eventually determined not to originate at the landfill), Chiquita Canyon Landfill was still allowed to expand. <u>Of the landfills discussed, organic waste diversion was required for Sunshine Canyon Landfill. At Newby Island Recovery Park, the settlement agreement required either stopping of composting or reducing its odor. Therefore, diversion of waste would not necessarily occur as a result of increased odor complaints. Furthermore, the effects of odor complaints on operations varies among facilities. In summary, any of the following may or may not be implemented at the WRSL, based on the survey of other facilities described in Impact 4.10-2:</u>
>
> - <u>prohibiting large trash deliveries during certain hours,</u>
> - <u>diverting organic food waste,</u>
> - <u>improving the cover to control landfill gas emissions,</u>
> - <u>improving gas collection and well efficiency and integrity,</u>
> - <u>paying substantially affected households,</u>
> - <u>stopping green waste composting or reducing odors from it,</u>

- avoiding turning greenery and compost on weekends, and
- using sprinklers for dust control.

Determining what measures would or would not be implemented at the WRSL would be speculative. Therefore, based on existing and future operations at WRSL, and research into other similar facilities around the state, potential impacts on the WRSL and on waste disposal service would be **less than significant**.

ODOR IMPACTS AND EFFECTS ON PCAPCD OPERATION

PCAPCD commented that "buildout of the SAP and PRSP Project will result in significant incremental increases of odor emissions and odor complaints due to its land use incompatibility." To clarify, the Draft EIR does not conclude that the increase in odor complaints by itself would be a significant impact; rather, the Draft EIR focuses on any physical impacts that may result from an increase in odor complaints. For example, the Draft EIR concludes under Impact 4.10-2 that the increase in odor complaints could create pressure for the WPWMA to implement additional odor control and reduction measures, which is indicative of land use consistency and compatibility impacts. The effect identified in PCAPCD's comment, however, is a purely economic impact. Indeed, PCAPCD claims only that the Draft EIR should "identify mitigation measures for…increased need for resources to deal with odor complaints[,] such as direct funding support to offset the costs for…additional services if the proposed project is approved." And, "[a]dditional odor complaints received by the District will require resources for investigation, response, and resolution. The District may need to adopt and enforce additional odor control regulations to address the increased number of public complaints regarding odors from the WRSL." The District claims that providing increased public services "will place a significant financial burden on the District," with fees potentially passed on to other jurisdictions and potentially to ratepayers via solid waste service fees.

Impacts that are purely economic need not be addressed under CEQA. State CEQA Guidelines Section 15131(a) states that "[e]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes…. The focus of the analysis shall be on the physical changes." Section 15358 also specifies that "[e]ffects analyzed under CEQA must be related to a physical change." Consistent with the CEQA principle that impacts involve physical changes in the environment, the State CEQA Guidelines Appendix G significance criterion for public services is whether the project would "result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities [or the] need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives…." Draft EIR page 4.13-19 lists the Appendix G significance criterion as a standard of significance for evaluating the project's impacts.

As previously described in this master response, the County recognizes odor complaints may increase as a result of the proposed project. Draft EIR page 4.10-17 concludes that "it is likely that increased development in the vicinity of WPWMA's landfill will result in an increase in odor complaints…." As previously discussed, mitigation has been added to the Draft EIR that, if implemented, could reduce odors from the WRSL. Mitigation Measure 4.3-6a outlines measures proposed by WPWMA that should be implemented at the WRSL to reduce odors. Odor reduction measures include those pertaining to composting operations (e.g., ASP technology, odor emissions testing and response, mixing building with biofilter scrubbing), landfill operations (e.g., odor neutralizers, increased landfill gas screening and collection), and site-wide technologies and operations (e.g., enhanced monitoring and modeling, community outreach, and tree-lined perimeter). Mitigation Measure 4.3-6b would require a monetary contribution by the proponents of Placer Ranch Specific Plan to WPWMA for odor mitigation, and participation by future developers of residential uses within the net SAP area in a regional odor mitigation fee program that can and should be developed by WPWMA. However, as explained previously, Mitigation Measure 4.3-6a is not feasible for Placer County to implement, and while Mitigation Measure 4.3-6b would serve to lessen the significant and unavoidable

environmental impacts of the project, the nature, degree and effectiveness of odor control measures that may ultimately be implemented are unknown. Therefore, substantial odor reductions may not occur. Odor complaints may be submitted to WPWMA or to PCAPCD or other agencies, at the discretion of the complainant; it is reasonable to conclude there is a possibility that PCAPCD would have to increase services to respond to an increased number of odor complaints.

The commenter does not identify a physical impact that would result from the potential increased financial burden on the District, and the County is not aware of a physical impact that would emanate from increased level of effort by PCAPCD to respond to odor complaints. PCAPCD does not indicate that additional facilities would be needed. It is also not possible to know how many complaints PCAPCD would need to investigate in the future, nor the increased level of staffing that may be needed at PCAPCD to address such complaints, or whether additional facilities—the construction and operation of which could result in environmental impacts—would be needed. It is, however, unlikely that so many additional employees would be needed that a new facility would need to be constructed, resulting in a physical impact on the environment. Therefore, no revisions have been made to the Draft EIR in response to this comment.

3.1.5 Master Response 5: Greenhouse Gas Mitigation

The Draft EIR evaluated impacts related to GHG emissions. Impact 4.7-2, "Operational greenhouse gas emissions" concludes that the potential project emission of GHG would be significant. The Draft EIR identifies a list of mitigation measures to reduce this impact; however, the Draft EIR concludes that after implementation of these measures, the impact would remain significant and unavoidable. Several comment letters suggested that the County consider additional GHG mitigation measures to be included in the Draft EIR. The County reviewed and considered each of these suggested measures. The discussion below categorizes each of the suggested mitigation measures based on whether they are already included in the project, could be included in the project, or are deemed infeasible and provides details regarding the County's reasoning. The suggested mitigation measures are identified with the triangle bullets.

SUGGESTED GHG MITIGATION ALREADY INCLUDED IN DRAFT EIR

Transportation-Related GHG Mitigation Measures

The following transportation-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

- **Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.**

  The following policy identified under the SAP would require preferred parking for such programs:

  - SAP Policy TM-4.4: Preferred Parking for Vanpools and Alternatively-Powered Vehicles, which states, "The County shall require the provision of preferred parking for vanpools and alternatively-powered vehicles, including electric cars, natural gas vehicles, and hydrogen fuel cell vehicles."

  Because this policy requires preferential parking, this measure is included in the Draft EIR and would not require revisions to the Draft EIR. For a response to the car sharing program, see the response below under "Addressed by Transit Master Plan."

- **Contribute funding to local and regional transit agencies.**

  There are several policies identified under the SAP that would require the project to contribute funding to local and regional transit agencies. These include the following measures:

- SAP Policy NR-7.4: Transit Funding, which states, "The County shall require new development to pay its fair share of the cost of transit facilities required to serve the new development;"

- SAP Policy TM-3.5: Transit Service, which states, "The County shall require fair share funding contributions by new development subject to discretionary review… for implementation of transit services to meet future demand;" and

- SAP Policy TM-3.1: Transit Service Planning, which states, "The County shall collaborate with neighboring transit agencies to update plans to include transit service to the Sunset Area… This update would include a funding mechanism for the establishment and operation costs of transit service to the Sunset Area."

Mitigation measures included in the Draft EIR require the project to contribute funding, including the following:

- Mitigation Measure 4.14-13a, on page 4.14-92 of the Draft EIR, states, "The County shall prepare a transit master plan for the SAP area, including the PRSP area." This mitigation measure includes potential coordination with Placer County Transportation Planning Agency and Roseville Transit.

- Mitigation Measure 4.14-13b, on page 4.14-92 of the Draft EIR, states that "a Community Service Area (CSA) Zone of Benefit (ZOB) shall be established by the project proponent, or the project proponent shall annex into an existing CSA ZOB to fund the cost of transit services proposed by the Transit Master Plan. This will include any related capital costs for buses, passenger amenities, and facilities."

Because there are policies included in the SAP that require transit funding and mitigation measures included in the Draft EIR that require the funding and developing of a transit master plan for the area, this GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

- **Electric vehicle chargers for apartment use.**

Electric vehicle supply equipment (EVSE) (i.e., electric vehicle chargers) are required in multi-family residential buildings pursuant to Mitigation Measure 4.7-2a on page 4.7-20 of the Draft EIR, which states, "Multi-family residential buildings shall design at least 10 percent of parking spaces to include EVSE, or a minimum of two spaces to be installed with EVSE for buildings with 2-10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices." This GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

Energy-Related GHG Mitigation Measures

The following energy-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

- **Site buildings to take advantage of shade, prevailing winds, landscaping, and sun screens to reduce energy use.**

The SAP Corridor Design Standards & Guidelines include the following related to siting buildings:

- Building orientation and fenestration should maximize natural daylighting and reduce cooling and heating loads.

- Orient buildings to maximize solar access, provide optimum daylighting and reduce energy costs.

These guidelines will be considered and incorporated when feasible for all project buildings. No revisions are necessary to the Draft EIR.

- **Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.**

  The following policy included under the SAP addresses efficient outdoor lighting:

  - SAP Policy NR-6.8, "Energy Efficient Lighting," which states, "Require the use of energy efficient lighting for all street, parking, and area lighting, to the extent feasible."

  Further, the 2016 California Energy Code has the following requirements for both residential and nonresidential buildings:

  - Section 150.0(k) requires high-efficacy lighting in all residential buildings; and
  - Section 130.1 Mandatory Indoor Lighting Controls requires daylighting and includes specifications for nonresidential and high-rise residential buildings.

  The SAP Corridor Design Standards & Guidelines includes the following guideline related to daylighting:

    - Orient buildings to maximize solar access, provide optimum daylighting and reduce energy costs.

  Because of the requirements of the California Energy Code and SAP Policy NR-6.8, all lighting in the project would be energy-efficient and project buildings would be oriented to maximize daylighting. It is important to note that the 2016 California Energy Code is currently in effect and all project buildings were assumed to be built to the 2016 iteration of the code. However, based on the project schedule, all project buildings will be built to at least 2019 California Energy Code standards. The 2019 standards are anticipated to reduce energy consumption by 30 percent in nonresidential buildings, mostly due to lighting upgrades (CEC 2018). Further, future building code requirements are anticipated to include more stringent energy efficiency and renewable energy requirements. This GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

- **Install light colored "cool roofs," cool pavements, and strategically-placed trees.**

  Mitigation Measure 4.7-2a on page 4.7-21 of the Draft EIR requires "All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2." Thus, cool roofs would be included on all project buildings.

  SAP Policy NR-5.9, "Cool Community Strategies," states, "The County shall promote Cool Community Strategies to cool the urban heat island, reduce energy use and ozone formation, and maximize air quality benefits by requiring new development to implement four key strategies: plant trees, selective use of vegetation for landscaping, install cool roofing, and install cool pavements."

  Further, SAP Corridor Design Standards & Guidelines includes the following standard related to cool pavement:

  - Use light-colored paving surfaces to reduce urban heat island effect.

  Because there is mitigation in the Draft EIR requiring the use of cool roofs on all project buildings, and SAP design standards require the use of cool pavement and trees, this GHG mitigation is already included in the project. No revisions are necessary to the Draft EIR.

- **Install energy-efficient heating and cooling systems, appliances and equipment, and control systems.**

  The California Energy Code requires energy-efficient heating and cooling systems, as well as appliances. Further, as required by Mitigation Measure 4.7-2a on pages 4.7-20–21 of the Draft EIR, all low-rise and mid-rise residential project buildings must comply with the energy efficiency performance standards set forth in Tier 2 of the 2016 California Green Building Standards Code (CALGreen), Section A4.203.1.2.2. This mitigation measure also requires all nonresidential and high-rise residential project buildings to comply with the energy efficiency performance standards set forth in Tier 1 of CALGreen, Section A4.203.1.2.1.

  CALGreen standards and energy efficiency are required through the following policies and guidelines:

  - SAP Policy NR-6.3, "CALGreen," which states, "The County shall require all new buildings shall comply with CALGreen building codes, including…heating and air conditioning standards…"

  - SAP Corridor Design Standards & Guidelines: Building design should prioritize efficient energy usage through thermal insulation, shading devices, efficient HVAC systems, and photovoltaic panels.

  Because all project buildings would be required to comply with CALGreen standards for energy efficiency, this GHG mitigation measure has already been included in the project. No revisions are necessary to the Draft EIR.

- **Install light emitting diodes (LEDs) for traffic, street, and other outdoor lighting.**

  Several policies included in the SAP address energy-efficient lighting (such as LEDs), including:

  - SAP Policy NR-6.8, "Energy Efficient Lighting," which states, "Require the use of energy efficient lighting for all street, parking, and area lighting, to the extent feasible."

  - SAP Policy LU/ED-3.9, "Lighting," which states, "Energy-efficient technology should be used wherever possible."

  In addition to these SAP policies, outdoor lighting associated with residential buildings would be required to be high-efficiency, pursuant to the California Energy Code, Section 110.9(e). No revisions are necessary to the Draft EIR.

- **Install energy-efficient heating, ventilation, and air conditioning. Educate consumers about existing incentives.**

  Regarding energy-efficient systems, see the response to "Install energy-efficient heating and cooling systems, appliances and equipment, and control systems," above. All future buildings constructed as a result of the project would be constructed to meet the current California Energy Code at the time of construction, which include energy efficiency requirements far more stringent than existing buildings. Existing incentive programs would not apply to new construction resulting from project implementation. No revisions are necessary to the Draft EIR.

- **No natural gas lighting. LED only with nighttime glare minimized.**

  Natural gas is not permitted to be used for lighting pursuant to the California Energy Code because it is not high-efficacy lighting. No project buildings would include natural gas-fueled lighting.

  LED lighting is one of several types of high-efficacy lighting that would be permitted under the California Energy Code. Several SAP policies and design guidelines address nighttime lighting and glare:

- SAP Policy LU/ED-3.9, "Lighting," Section 6 states, "Lighting shall be designed to minimize projection into adjacent properties and onto adjacent roads and not provide a source of glare."
- SAP Corridor Design Standards & Guidelines: All lighting shall be Dark Sky compliant.
- SAP Corridor Design Standards & Guidelines: Reduce night-time light pollution by shielding fixtures and directing light downward. Comply with County ordinances regarding light pollution, night sky requirements and fixture/lamp type(s).

Further, all nonresidential and high-rise residential buildings would comply with 2016 CALGreen standards, which includes a mandatory measure (5.106.8) that requires light pollution reduction associated with outdoor lighting. For these reasons, nighttime glare would be minimized, and high-efficacy lighting would be used. This GHG mitigation measure is included in the project. No revisions are necessary to the Draft EIR.

- **Drought-resistant trees that do not block solar.**

The following SAP policy addresses drought-resistant landscaping:

- SAP Policy LU/ED-3.8, "Landscaping," which states, "All landscaping shall comply with the requirements of the WELO, including use of native species that are drought-resistant."

Further, the SAP Corridor Design Standards & Guidelines identify native and drought-resistant plants that can be used for landscaping throughout the SAP area. Because there are policies addressing maximizing solar generation (see response above), it is not anticipated that trees would be planted that have the potential to block solar photovoltaics. For these reasons, this GHG mitigation measure is already included in the project. No revisions are necessary to the Draft EIR.

- **Solar photovoltaics in all parking lots.**

The following SAP policies address the installation of solar photovoltaics in parking lots:

- SAP Policy LU/ED-3.5, "Parking," Section C states, "Where shade structures are provided, encourage the installation of solar panels."
- SAP Policy NR-5.9, "Cool Communities Strategies," Section C states, "Shading of hardscapes (such as sidewalks, roadways, and parking lots) with trees, vegetated trellises, or structures covered with solar panels or materials with high solar reflectance."

Because there are policies in place to encourage the installation of solar panels in parking lots, and solar installation is required through Mitigation Measure 4.7-2a on pages 4.7-20–21 of the Draft EIR, this GHG mitigation measure is included in the project. No revisions are necessary to the Draft EIR.

Water-Related GHG Mitigation Measures

The following water-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

- **Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.**

The following SAP policies and Corridor Design Standards & Guidelines address water-efficient irrigation systems:

- SAP Policy PFS-3.2, "Efficiency and Demand Reduction," Section B, "Requiring water-conserving landscaping and other conservation measures consistent with the Water Efficient Landscaping Ordinance…"

- SAP Policy NR-6.5, "Water Efficient Landscape Design," which states, "The County shall require all new development to comply with the County's Water Efficient Landscape Ordinance (WELO) to reduce water used for landscaping irrigation…"

- SAP Corridor Design Standards & Guidelines: Install "smart" or "intelligent" irrigation systems for all trees, shrubs, groundcovers, perennials, turf and ornamental grasses. Irrigation systems should be controlled by smart controllers with appropriate microclimate sensing capabilities.

The PRSP also includes water conservation measures in the utilities section of the plan, which states "Smart/Centrally Controlled Irrigation Controllers restrict irrigation to only the times and water application rates necessary to maintain landscaping. They account for water demand changes based on weather patterns and seasonal influences."

Because of the requirements of the WELO and the numerous policies and design guidelines included in both the SAP and the PRSP, it is anticipated that all irrigation systems would be water-efficient. This GHG mitigation measure is included in the project. No revisions are necessary to the Draft EIR.

- **Design buildings to be water-efficient. Install water-efficient fixtures and appliances.**

Mitigation Measure 4.7-2a, on page 4.7-21 of the Draft EIR, states, "All project buildings shall comply with requirements for water efficiency and conservation as described in the 2016 California Green Building Standards Code, Division 4.3 and 5.3."

Further, pursuant to Mitigation Measure 4.7-2a on pages 4.7-20 and 4.7-21 of the Draft EIR, all low-rise and mid-rise residential buildings would be required to comply with Tier 2 of the 2016 CALGreen standards, which include water conserving plumbing fixtures and fittings pursuant to Section 4.303.1. Nonresidential and high-rise residential buildings would be required to comply with Tier 1 of the 2016 CALGreen standards, which include water conserving plumbing fixtures and fittings pursuant to Section 5.303.3, and a 12 percent reduction for indoor potable water use in Section A5.303.2.3.1.

As shown above, this GHG mitigation measure is already included in the project. No revisions are necessary to the Draft EIR.

- **Implement LID practices that maintain the existing hydrologic character of the site to manage stormwater and protect the environment. Retaining stormwater runoff on-site can drastically reduce the need for energy-intensive imported water at the site.**

The following SAP policies and design guidelines address low-impact development:

- SAP Policy LU/ED-3.12, "Impervious Surfaces/Low-Impact Development," states, "The County shall require that all new discretionary development be designed in accordance with the West Placer Storm Water Quality Design Manual to incorporate Site Design Measures and Low-Impact Development features to infiltrate runoff from impervious surfaces."

- SAP Policy PFS-5.7, "Low-Impact Development," states, "The County shall require that new development comply with the West Placer Storm Water Quality Design Manual to manage urban development runoff through the use of low-impact development (LID) features…."

As discussed in the policies listed above, detailed requirements for incorporating LID features are included in the West Placer Storm Water Quality Design Manual. These features are required by all new development projects.

Further, all nonresidential and high-rise residential buildings must comply with Tier 1 of the 2016 CALGreen standards, which includes low-impact development requirements stated in Section A5.106.3.

For these reasons, this GHG mitigation measure was included in the project. No revisions are necessary to the Draft EIR.

SUGGESTED GHG MITIGATION TO BE ADDED TO THE DRAFT EIR

Transportation-Related GHG Mitigation Measures

Several transportation-related GHG mitigation measures have been proposed in comments, including the following:

- **Create car sharing programs.**
- **Create local "light vehicle" networks, such as neighborhood electric vehicles systems.**
- **Provide public transit incentives such as free or low-cost monthly transit passes.**

As described above, the Draft EIR includes Mitigation Measure 4.14-13a that requires a transit master plan to be developed for the SAP area that "shall identify how transit service will be delivered to the SAP and ensure that the service adequately serves transit demand in the SAP" (page 4.14-92). Mitigation Measure 4.14-13b of the Draft EIR states that the transit master plan shall identify how transit service will be delivered to the PRSP area and will be prepared in collaboration with Placer County Transit and Placer County staff and submitted to the County for approval (page 4.14-92). The transit master plan that will be prepared for the project will address the demand for alternative modes of transportation and funding components. In response to these comments, Mitigation Measure 4.14-13a on page 4.14-92 of the Draft EIR is revised as follows:

> #### Mitigation Measure 4.14-13a: Prepare a transit master plan for SAP area (Net SAP Area and PRSP Area)
>
> The County shall prepare a transit master plan for the SAP area, including the PRSP area. The transit master plan will be a County-led effort but may also be done in collaboration with PCTPA when PCTPA updates its Long-Range Transit Master Plan. Roseville Transit will also be consulted. The transit master plan shall identify how transit service will be delivered to the SAP and ensure that the service adequately serves transit demand in the SAP. Transit service could include but would not be limited to car-sharing programs, neighborhood electric vehicle systems, and free or low-cost monthly transit passes.

Energy-Related GHG Mitigation Measures

The following energy-related GHG mitigation measure (shown in bold) has been incorporated into Mitigation Measure 4.7-2a of the Draft EIR:

- **Use combined heat and power in appropriate applications.**

This suggestion identifies cogeneration facilities to reduce energy use associated with HVAC systems. Cogeneration facilities are typically applied in large commercial and institutional structures. These types of developments would be allowed under the SAP. It is possible that there may be opportunities for cogeneration facilities in the Sac State—Placer Center; however, the CSU would ultimately make the feasibility determination. Therefore, Mitigation Measure 4.7-2a of the Draft EIR is revised as follows to allow cogeneration as an option for reducing energy use:

- Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Reductions can also be achieved by incorporation of co-generation facilities.

Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.

Also, it should be noted that SAP Policy NR-6.7 has been revised as follows:

NR-6.7: Residential Energy Efficiency. The County shall require ~~encourage~~ new residential units to be designed and constructed to maximize energy efficiency. This ~~should~~ shall include ~~consideration of~~ the following design features:

A. Installation of solar photovoltaic systems ~~Pre-plumbing and structural design to accommodate solar energy systems~~.

B. Installation of energy conservation appliances such as tankless water heaters and whole house fans in all residential units.

C. Installation of energy efficient AC units and heating system with programmable thermostat timers, to the extent feasible.

D. Use of low flow water fixtures such as low flow toilets and faucets, to the extent feasible.

SUGGESTED GHG MITIGATION DEEMED INFEASIBLE

Several GHG-reduction measures suggested by commenters were reviewed by the County and were deemed infeasible. These are discussed below. The Draft EIR has not been revised to include these measures.

Energy-Related GHG Mitigation Measures

The following energy-related measures (shown in bold) were suggested by commenters to reduce GHG emissions:

- **Limit the hours of operation of outdoor lighting.**

  This suggested GHG mitigation measure does not specify what types of outdoor lighting should have limited operation hours. However, there are several SAP design guidelines and policies that encourage outdoor and night lighting to promote public safety and provide social opportunities, including the following:

  - SAP design guideline: Public spaces should be well-shaded during the day and well-lit at night to encourage outdoor activities, site activation and security.
  - SAP Policy LU/ED-3.9, "Lighting," states, "Lighting on site should be designed to promote pedestrian comfort and safety and to enliven public gathering spaces."

  Further, there are many policies and design guidelines in the SAP and PRSP that require all lighting to be energy efficient. Because this measure would conflict with project policies and guidelines and because measures are already identified that require energy-efficient lighting, this measure is not included in the project and no additional revisions to the Draft EIR are necessary.

- **"Smart glass" electrochromatic windows.**

  Electrochromic windows can reduce energy consumption by shading buildings from the sun. However, this type of technology can be prohibitively expensive. Further, all project buildings would be highly energy efficient, as they would be built to the latest iteration of the California Energy Code. As stated in the SAP Corridor Design Standards & Guidelines, "Building orientation and fenestration should maximize natural daylighting and reduce cooling and heating loads." It is unknown how much energy savings

would be possible for the addition of electrochromic windows. However, it is possible that future building occupants will choose to install this technology, but it is not included as required mitigation because all project buildings would be highly energy efficient and oriented to reduce cooling and heating loads.

Transportation-Related GHG Mitigation Measures

The following transportation-related measure (shown in bold) were suggested by commenters to reduce GHG emissions:

- **Build or fund a transportation center where various public transportation modes intersect.**

  Placer County Transportation Planning Agency (PCTPA) assists local transit agencies, including Placer County, in developing short-term transit plans, and the long-range Transit Master Plan. These independent transit plans reflect changes in population, gaps in the transportation system, evaluate existing services, and analyze opportunities to provide more cost-effective transportation options. Due to the long buildout of the project, its transportation demands are not analyzed in the short-term transit plans. The population and associated transportation demand of the project was included in the long-range Placer County 2036 Regional Transportation Plan but there have been no capital projects identified to construct a transportation center in the project area. A transportation center would require substantial coordination with PCTPA, Placer County Transit, Roseville Transit, and other transportation agencies. As discussed in the Draft EIR, the project would be required to contribute funding to local and regional transit agencies. However, development of (or financial contribution to development of) a transportation center would not be feasible due to the current lack of planning for such a facility and the need for such a facility to be planned and coordinated with a multitude of other agencies.

Other GHG Mitigation Measures

The following other measures (shown in bold) were suggested by commenters to reduce GHG emissions:

- **Ban grass lawns for water conservation leading to less energy use.**

  The PRSP includes the following water conservation measures for residential and nonresidential turf:

  - Residential Turf Reductions: Typically, about 70 percent of a total residential front yard is assumed to consist of landscaping, with the remainder consisting of driveways, planters, or walkways. For the PRSP, limitations are to be placed on the landscaped portion of each yard, allowing up to 42 percent of the total area to be turf, with the remaining landscaped area comprised of low water use plant species that use between 65-75 percent less water than an average lawn.

  - Turf Reductions in Non-Residential Parcels: where turf is incorporated into landscape design, it should be located in high-visibility areas and augmented by low-water-use plant species. Specific requirements for schools, parks, and roadways follow:

    - Parks – It is assumed that approximately 80 percent of a typical park's square footage consists of landscaping. Within the PRSP, the total cumulative land area of all parks is to incorporate a maximum of 60 percent turf, leaving approximately 20 percent for low water use plant species and 20 percent for hardscape and other non-landscaped features. Utilizing less than 60 percent turf is acceptable provided the park can adequately provide all planned amenities, as depicted on the conceptual park plans provided in the Placer Ranch Design Guidelines.

    - Schools – It is assumed that approximately 70 percent of a school's site square footage consists of turf. Within the PRSP, site design is to incorporate a maximum of 40 percent of site area for turf, leaving 30 percent for low water plant species and 30 percent for buildings and other hardscape/non-landscaped features.

- Roadways – It is assumed that approximately 15 percent of roadway corridors are comprised of landscaping. Within the PRSP, roadway corridor design is to incorporate a maximum of 5 percent of area for turf, leaving 10 percent for low water use plant species and 85 percent for roadway surface, sidewalks, and other non-landscaped features. It is assumed that Placer Parkway's landscape corridors will not be irrigated.

These water conservation measures would substantially reduce the amount of turf allowed throughout the PRSP. Further, all landscaping in the SAP area must comply with the requirements of the Water Efficient Landscape Ordinance (SAP Policy LU/ED-3.8), which reduces landscape-related water use by promoting water-efficient landscapes, limiting turf, preventing wastewater, and incentivizing the use of graywater and recycled water in development projects. While the SAP and PRSP do not explicitly ban turf, there are many policies and requirements under the SAP and PRSP that would limit the amount of turf allowed and require water-efficient landscaping. For these reasons, this measure is not included in the project and no additional revisions to the Draft EIR are necessary.

- **Consider using compacted crushed rock for trails. It's cheaper, faster, permeable, and produces less CO_2 emissions than concrete.**

  All trails included in the SAP and PRSP are intended to use natural materials in open space areas of the SAP area, unlike the shared use paths. The shared use paths are intended to meet all Americans with Disabilities Act requirements and would be made with high-albedo concrete or other materials. No revisions to the Draft EIR are necessary.

3.1.6 Master Response 6: Drainage and Flooding

Several comments raise similar concerns related to the project's stormwater retention. The most common concern relates to the fact that the Pleasant Grove Retention Facility, although an approved project, is not designed with capacity to meet the project's need for volumetric stormwater retention, and that the Draft EIR identifies the Pleasant Grove Retention Facility for off-site stormwater retention. Comments suggest that it is inappropriate to identify a stormwater retention solution that is not approved. However, there appears to have been some confusion regarding the project's retention strategy described in the Draft EIR, which indicates that the Pleasant Grove Retention Facility is not the only option available to meet the project's stormwater retention needs. The Draft EIR states (page 3-26) that development in the SAP area would require stormwater volumetric retention as a means to minimize increased stormwater volumes that would otherwise reach the Sacramento River and that volumetric retention could be either on site or off site; however, off-site facilities on a regional scale would be more practical for the SAP, and several have already undergone some level of planning and design. Page 3-58 of the Draft EIR provides even further clarity indicating that retention is proposed to occur either on-site, in the existing City of Lincoln Lakeview Farms retention basin, or in a proposed retention basin that could be constructed on the Scilacci Farms property, for which the County is currently working to secure an easement. This easement has been secured since release of the Draft EIR. As such, the sixth paragraph on page 3-58 of the Draft EIR is revised as follows:

> To minimize impacts associated with increases in stormwater volume within the Auburn Ravine watershed, retention is proposed to occur either on-site, in the existing City of Lincoln Lakeview Farms retention basin, or in a proposed retention basin that could be constructed on the Scilacci Farms property, for which the County ~~is currently working to secure an easement~~ secured an easement on for flood control. A feasibility study has been conducted that confirms that any of these retention basin options could provide the needed capacity. Although the Lakeview Farms retention basin has undergone CEQA review and is available for retention, further project-level CEQA analysis would be required before the Scilacci Farms property could be used for retention purposes.

Therefore, several retention options are identified, including on-site retention. Therefore, the project is not dependent on implementation of the Pleasant Grove Retention Facility.

Other comments expressed concern related to the funding and timing of the Pleasant Grove Retention Facility relative to project implementation. The Draft EIR (page 3-58) states that using the facility would require a cooperative agreement between the City of Roseville and Placer County for basin construction and maintenance paid through a fee collected by the County or County/City or an equivalent mechanism that fully funds the project. At such time that adequate funds have been collected, facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs as well as larger, regional needs. If the City and County are unable to memorialize a joint retention facility agreement, construction of equivalent retention facilities, whether on-site or off-site elsewhere, would be required. (Note that this EIR assumes that Pleasant Grove Retention Facility would be used for off-site retention; if a different off-site facility is needed for retention in the Pleasant Grove Creek watershed, additional CEQA review would be required.) Lastly, interim on-site retention facilities may be implemented for various projects in the SAP and PRSP areas unless or until the Pleasant Grove Retention Facility is operational or other permanent equivalent facilities are available for retention. The Draft EIR states (page 3-69): "To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, a fee program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements."

Some comments indicated that Pleasant Grove Retention Facility is not an approved project and requires CEQA evaluation. Other comments acknowledge that the Pleasant Grove Retention Facility is an approved project, but indicate that, due to the fact that it does not have adequate volumetric retention capacity to accommodate stormwater increases associated with the project, the expansion should be evaluated in the Draft EIR. The City of Roseville certified an EIR for the Pleasant Grove Retention Facility (City of Roseville Retention Basin Project EIR, State Clearinghouse Number 2000022007). See page 4-5 of the Draft EIR for more information. As explained on page 4-5, the Pleasant Grove Retention Facility, contemplated and analyzed at a project-level herein as a larger facility than that evaluated by the City of Roseville in 2002, would be expanded to provide needed stormwater volumetric retention for the SAP and PRSP areas and is included as part of the project. Although other alternatives are available, conveyance of project-site stormwater to this future expanded facility would best meet project objectives. The Draft EIR includes evaluation of impacts associated with the expanded Pleasant Grove Retention Facility. As described in Chapter 3 of the Draft EIR, "Project Description," the Pleasant Grove Retention Facility is being evaluated as part of the proposed project.

3.1.7 Master Response 7: Program- vs. Project-Level Analysis

Several commenters critiqued the approach taken in the Draft EIR to analyze the SAP at a program level and the PRSP at a project level.

The State CEQA Guidelines contain guidance on when a program EIR may be prepared and describe the focus of a project EIR. As explained on Draft EIR page 1-2, State CEQA Guidelines Section 15168 states that "a program EIR may be prepared on a series of actions that can be characterized as one large project and, among other things, are related geographically or in connection with issuance of rules, regulations, or plans to govern the conduct of a continuing program." State CEQA Guidelines Section 15161 states that "a project EIR focuses on the changes in the environment that would result from a development project."

Although several commenters assert that calling an analysis "project level" or "program level" necessarily results in a requirement that the EIR contain a certain level of specificity, that is not the case. Indeed, in practice, the phrase "program EIR" is often used to refer to an EIR that presents a higher level of analysis with less detail, whereas the phrase "project EIR" is often used to refer to an EIR that presents a more detailed level of analysis. However, the name of the analysis—program or project level—does not ultimately dictate the specificity required in an EIR under CEQA. Instead, State CEQA Guidelines Section 15146, as noted on Draft EIR page 4-1, speaks to the degree of specificity necessary in an EIR: "The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." In addition, importantly, Section 15146(a) continues:

> An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.

Section 15146(b) further states:

> An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

A public comment on the Draft EIR (See comment 4-14) suggests that Section 15168(b) describes program EIRs as possibly providing for more exhaustive consideration of effects and alternatives than an EIR on an individual action in order to ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis. Contrary to the commenter's suggestion that the Draft EIR "seems to imply" that a program EIR's purpose is "to avoid detailed analyses," Section 15168(b) merely lists potential benefits that use of a program EIR can provide; it does not dictate what contents a program EIR shall contain. Section 15168(b) states that "[u]se of a program EIR *can* provide the following advantages," and "[t]he program EIR *can*" before listing several potential benefits (emphasis added). The use of the word "can" indicates that these are not requirements. To reiterate, the level of specificity in an EIR is not dictated in the State CEQA Guidelines by the name of the analysis—program or project—but instead by Section 15146 and the level of detail known about activities associated with the project.

Given CEQA requirements regarding the specificity of analysis in an EIR, the Draft EIR contains sufficiently detailed analysis of the SAP and PRSP. As explained in the Draft EIR on pages 4-1 and 4-2, the SAP and the Sac State–Placer Center portion of the PRSP are evaluated at a program level, whereas the PRSP (except for the Sac State—Placer Center) is evaluated at a project level. Therefore, in general, more detail can be provided for impacts of the PRSP, and less detail is provided about impacts of the SAP and the Sac State–Placer Center. Again, the level of detail required is dictated by Section 15146 rather than the name given to the analysis. And in cases where the level of detail of impacts identified for the PRSP and the SAP is similar, it follows that, for significant impacts, mitigation would also be the same.

3.1.8 Master Response 8: Recirculation

The County received comments stating it should revise and recirculate the Draft EIR for an additional round of public review and comment. This master response discusses the standards generally applicable to this issue and applies those standards to the comments requesting recirculation.

A lead agency is required to recirculate a Draft EIR when the agency adds "significant new information" to the EIR after the close of the public comment period but before certification of the Final EIR (PRC Section 21092.1; State CEQA Guidelines Section 15088.5). "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement" (State

CEQA Guidelines Section 15088.5[a]). As outlined in Section 15088.5(a), "significant new information" includes information showing that:

- a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- a feasible project alternative or mitigation measure considerably different from that discussed in the Draft EIR would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it; or
- the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

No new significant impacts have been identified in the Final EIR. Several new mitigation measures have been added (e.g., Mitigation Measure 4.3-6a), but the mitigation measures address significant impacts that were already identified in the Draft EIR, and no new or more severe significant impact would result from implementing the new mitigation measures. Additionally, the process of responding to comments has not resulted in the determination that an environmental impact identified in the Draft EIR has a substantially greater impact than that described in the Draft EIR. No new feasible alternatives have been added to the EIR. Although additional mitigation measures were added to the Draft EIR, the County has not declined to adopt them. Finally, the County believes that the Draft EIR is adequate under CEQA. For these reasons, recirculation is not required.

3.1.9 Master Response 9: Mitigation and Development Fees

Several comments raised questions regarding how various improvements and mitigation measures would be funded. These are addressed in individual responses to comments; however, this master response is provided to clarify the funding of improvements related to public services, transportation facility improvements, and the Pleasant Grove Retention Facility improvements.

Regarding the potential for the project to financially impact local public services, such as fire protection, police protection, and library services, the County has prepared a fiscal impact analysis and financing plan for the PRSP, pursuant to its General Plan Policy 4.B.6, which examines the impact on the project on County services. In addition, there are several mitigation measures identified which require the project to create or annex into a Community Facilities District or County Service Area zone of benefit or provide other funding mechanism to provide revenues to cover the cost of road maintenance, park maintenance, library services, and Countywide service that serve the development.

Regarding funding for traffic improvements discussed in the Draft EIR, the PRSP and development within the net SAP area will be required to pay Sunset Benefit District traffic fees, as well as traffic fees for both regional roadway impacts as planned through various joint powers agencies and other groups the County participates in to mitigate impacts to off-site roadways that are outside the County's land use authority. As stated in several of the traffic mitigation measures included in the Draft EIR, fair share funding for improvements at City of Roseville and City of Rocklin locations would be incorporated into the development agreement between Placer County and the landowner in the PRSP area. Placer County will work with the City of Roseville and City of Rocklin to determine this fair share fee. It should also be noted that the County is collecting traffic impact fees from development in the Dry Creek Benefit District, which will ultimately fund necessary traffic improvements in this area that are identified in the Draft EIR. Development within the PRSP and net SAP areas will also pay the Countywide Capital Facility Fee and annex into the Countywide Fire Facility Fee Program to mitigate impacts from new growth on countywide facilities and fire facilities that provide general governmental services and fire and emergency service to residents who live within the

unincorporated areas. Lastly, PRSP and net SAP development would be subject to any fees not otherwise mentioned but identified within the MMRP as well.

Regarding funding of the Pleasant Grove Retention Facility expansion, or other offsite regional retention facility as needed to retain drainage flows from the PRSP/SAP area, as stated in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize the City of Roseville's Pleasant Grove Retention Facility, and an agreement has been negotiated between Placer County and the City of Roseville for such use, the applicants for individual projects would annex into the City of Roseville Regional Retention Basin fee district, or equivalent County fee program administered for such purpose, and pay the Pleasant Grove drainage retention fee, which would be calculated to cover the fair-share cost to accommodate the contribution of flows retained on behalf of each specific PRSP/SAP project. Costs to participate in the Pleasant Grove Retention Facility, or other offsite regional retention facility, would be dependent on an agreement with the City of Roseville, or formation of some sort of Joint Power Authority between Placer County and Roseville, as the basin is owned by the City of Roseville. Preliminary analysis was included within the EIR to demonstrate that the Pleasant Grove Retention Facility has the capacity, upon expansion, to handle additional retention demand for the PRSP/SAP area. Subsequent analysis may be needed for project level expansion of the facility at the time expansion is proposed; in the interim the fee program will continue to collect mitigation fees to be used for future facility expansion. For more details regarding the drainage options for the project, see Master Response 6: Drainage and Flooding.

3.2 RESPONSES TO INDIVIDUAL COMMENTS

3.2.1 Agencies

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWS

DEPARTMENT OF TRANSPORTATION
DISTRICT 3
703 B STREET
MARYSVILLE, CA 95901
PHONE (530) 741-4286
FAX (530) 741-4245
TTY 711
www.dot.ca.gov/dist3

Letter 1

Making Conservation a California Way of Life.

February 22, 2019

GTS# 03-PLA-2016-00370
03-PLA-065 PM Var
SCH# 2016112012

Shirlee Herrington
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603

Sunset Area Plan/Placer Ranch Specific Plan Project

Dear Shirlee Herrington:

Thank you for including the California Department of Transportation (Caltrans) in the environmental/application review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

The project proposes to update the 1997 Sunset Industrial Area (SIA) Plan. The proposed plan update, now called the Sunset Area Plan (SAP), identifies a higher density mix of labor- and employment-intensive uses with an emphasis on innovation and creativity. Nested within the SAP, the proposed Placer Ranch Specific Plan (PRSP) includes a mixed-use town center, commercial and office uses, a university site, and a diverse housing mix. The SAP, which includes the PRSP project site, encompasses 8,497 acres located in unincorporated south Placer County. The Plan area covers 13.9 square miles between the cities of Rocklin to the east, Roseville to the south, Lincoln to the north, and unincorporated Placer County to the west. The Plan area is located immediately west of State Route (SR) 65 which connects to Interstate 80 (I-80) in the south and SR 99 to the north. The proposed PRSP area includes 2,213 acres in the southern portion of the Sunset Area Plan. The southern boundary of the PRSP area is contiguous with the existing Roseville City limits, and the northern boundary is defined, in part, by the existing alignment of Sunset Boulevard West, west of Fiddyment Road. The following comments are based on the Draft Environmental Impact Report (DEIR) received.

Traffic Forecasting and Modeling

The SAP and PRSP are anticipated to develop over many years. The basis for identifying and mitigating foreseeable cumulative traffic effects in the 20-years horizon

1-1

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

are mainly focused on the PRSP project.

The trips generated by the proposed project will be in the thousands. A Project-Only trip generation table should be provided to identify the number of trips generated by the project. Providing trip generation for each land use will help properly identify where the trips are coming from. The peak hour trips that will be generated in this project will go beyond the 100-peak trip threshold. Contribution to mitigations should be made to provide improvements to SR-65, to new or current interchanges connected to SR-65, and ramp meters for SR-65.

According to Table 13, the percentage of external trips that will be made due to the PRSP development plus existing conditions is 75% (161,941 trips) while internal trips are 25% (54,458 trips). The 161,941 external trips are about 170% of the provided existing ADT of SR-65 (about 91,600 ADT). The "Change in Average Daily Traffic for Existing and Existing Plus Placer Ranch Conditions" figure shows that the ADT along some segments of SR-65 increased by a maximum of 6,000 vehicles while some segments decreased by 6,000 vehicles. This example does not properly convey the effects of the external trips to SR-65. Please provide an explanation for this inconsistency. Although a "Change in Average Daily Traffic" figure can be analogous to a Trip Distribution figure, a Trip Distribution figure should be provided to properly show trends from generated trips from the proposed project.

1-1 cont.

Traffic Operations

The proposed project currently has existing bicycle/pedestrian and bus facilities serving the nearby Sunset Boulevard vicinity which will be connected to future multi-modal facilities. It is recommended that this project also provide connection to the Whitney Ranch Parkway area to complete a future system which would connect to existing bicycle/pedestrian and bus facilities.

1-2

Currently, SR 65 is operating at Level of Service (LOS) F. It is anticipated that this project would generate thousands of additional peak hour trips and introduce significant amount of delays on SR 65. The need to identify traffic operational impacts and mitigations that this proposed development will bring is a critical component to the continued operation of the existing state facilities. It is recommended that the proposed development provide contribution on mitigation to the following:

- Improvement of Industrial Boulevard, which is a local roadway, that is parallel to SR 65 and serves as a one of the arterial connections to SR 65.
- Connect Whitney Ranch Parkway eastbound from Industrial Boulevard the SR 65 interchange.
- Upgrade the Whitney Ranch Parkway interchange (similar to Sunset Boulevard IC) to add southbound on/off ramps and a northbound entrance access/ramp from eastbound Whitney Ranch Parkway widen the existing ramps. Also add ramp metering to all HOV lane entrance ramps.

1-3

- Addition of ramp metering to the HOV lanes on the Sunset Boulevard interchange.
- Addition of auxiliary lanes in both direction of SR 65 between Whitney Ranch Parkway and Sunset Boulevard interchanges.
- Mainline HOV lane on both directions of SR 65.

1-3 cont.

Hydraulics

The development of Sunset Area Plan and Placer Ranch Specific Plan will increase impervious surface area through the construction of a mixed-use town center, commercial and office uses, a university site, and a diverse housing mix, etc. with a corresponding increase in surface water runoff. The foreseeable development projects would develop over 50,000 acres in the region, adding more than 100,000 residential units and millions of square feet of non-residential building floor area. This project will decrease surface water detention, retention and infiltration.

No net increase to 100-year storm event peak discharge may be realized within the State's highway (SR 65) right of way and/or Caltrans drainage facilities because of the project. Any cumulative impacts to Caltrans drainage facilities arising from effects of development on surface water runoff discharge from the 100-year storm event should be minimized through project drainage mitigation measures.

Increases in peak runoff discharge for the 100-year storm event to the State's highway (SR 65) right of way and to Caltrans' highway drainage facilities must be reduced to at or below the pre-construction levels. The cumulative effects on drainage due to development within the region should be considered in the overall development plan of this area.

1-4

All grading and/or drainage improvements must maintain or improve existing drainage pathways and may not result in adverse hydrologic or hydraulic conditions within the State's highway (SR 65) right of way or to Caltrans drainage facilities. The developer must maintain or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished through the implementation of storm water management Best Management Practices (i.e., detention/ retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.). Once installed, the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.

Runoff from the proposed project that will enter the State's highway (SR 65) right of way and/or Caltrans drainage facilities must meet all regional water quality control board water quality standards prior to entering the State's highway (SR 65) right of way or Caltrans drainage facilities. Appropriate storm water quality Best Management Practices may be applied to ensure that runoff from the site meets these standards (i.e., is free of oils, greases, metals, sands, sediment, etc.). Once installed, the property owner must

properly maintain these systems in perpetuity.

1-4 cont.

All work proposed and performed within the State's highway (SR 65) right of way must be in accordance with Caltrans' standards and require a Caltrans Encroachment Permit prior to commencing construction.

Based on Title 23, the Pleasant Grove Creek and Auburn Ravine which are located within the SAP site are listed as Regulated Streams of Central Valley Flood Protection Board (Board) of DWR. If this project is implemented within the boundary of Pleasant Grove Creek and Auburn Ravine, the encroachment permit shall be obtained from the Board.

1-5

Please provide our office with copies of any further actions regarding this project or future development of the property. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any question regarding these comments or require additional information, please contact David Smith, Intergovernmental Review Coordinator for Placer County, by phone (530) 634-7799 or via email to david.j.smith@dot.ca.gov.

Sincerely,

KEVIN YOUNT, Branch Chief
Office of Transportation Planning
Regional Planning Branch—East

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

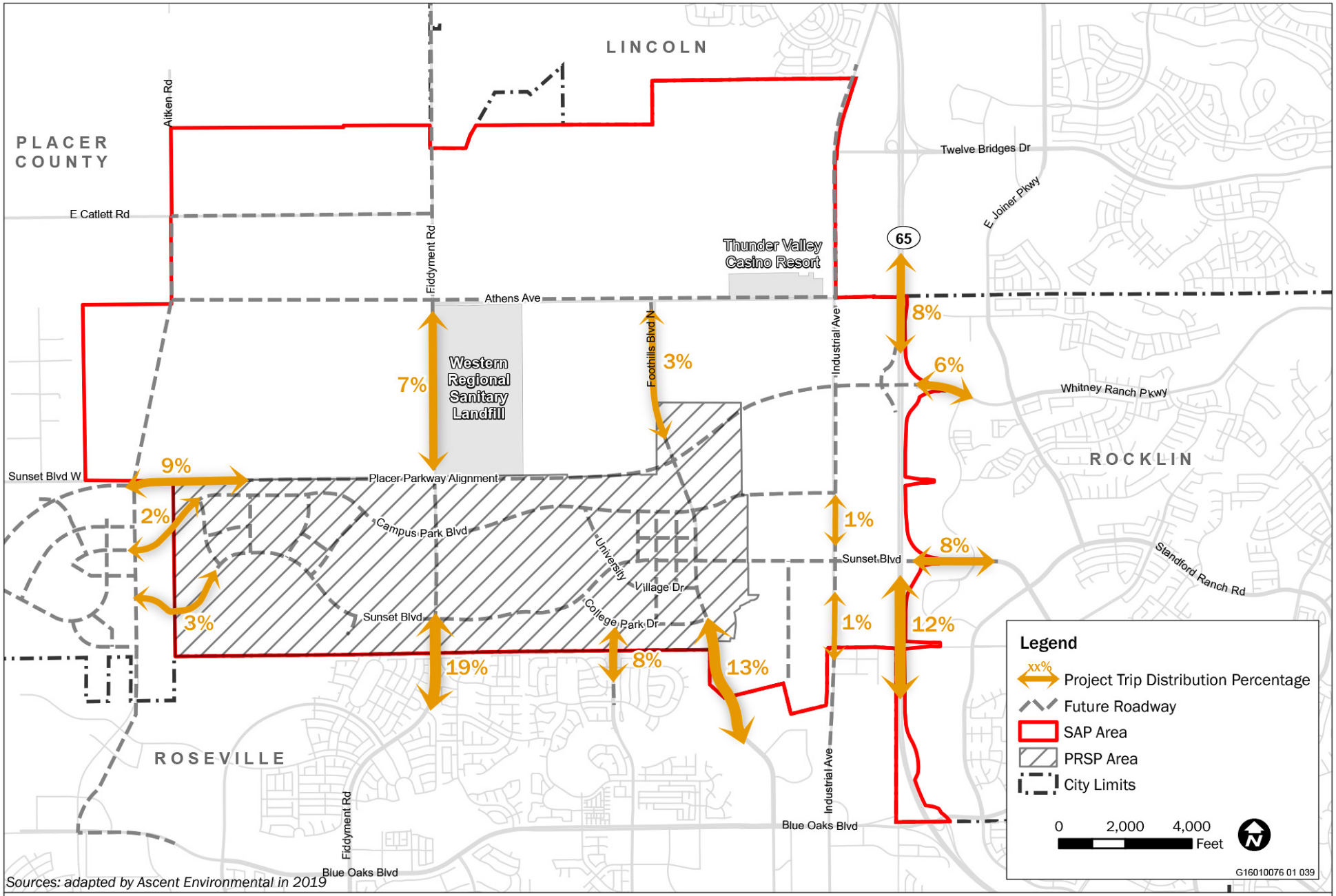
Letter 1	California Department of Transportation Kevin Yount, Branch Chief, Office of Transportation Planning Regional Planning Branch—East February 22, 2019

1-1 The comment requests a project-only trip generation table to identify the number of trips generated by the project. The comment raises issues with Draft EIR Exhibit 4.14-11, stating that the changes in average daily traffic (ADT) shown do not convey the effects of project trips on State Route 65 (SR 65). The comment also requests a trip distribution figure to show the travel patterns from trips generated by the project. Table 4.14-19 in the Draft EIR presents the project trip generation for the PRSP. As described on page 4.14-43 of the Draft EIR, Exhibit 4.14-11 reflects the project's effect on sub-regional travel patterns. This means the analysis accounts for a redistribution of existing trips that would occur with the proposed project. For example, nearby residents that currently travel to businesses and services further away may instead travel to businesses and services that are located in the PRSP area. As a result, some existing trips on SR 65 travel to destinations in the proposed project, resulting in a decrease in trips on some segments as existing traffic diverts off SR 65. Furthermore, the addition of project trips is partially offset by this redistribution of existing trips resulting in a lower net increase. As shown in this figure, the greatest change in traffic occurs on roadways that directly serve the PRSP area, which is expected with the addition of project uses. Intuitively, the project's effect on traffic dissipates further from the project.

In response to the comment, a trip distribution exhibit has been prepared (Exhibit 3-5).

1-2 The comment requests the project provide bicycle/pedestrian and bus facilities connecting to the Whitney Ranch Parkway area (i.e., on Placer Parkway). As described on pages 4.14-36 and 4.14-50 of the Draft EIR, Placer Parkway would provide transportation connections between the project and the Whitney Ranch Parkway area, and would serve vehicular modes, including transit. However, bicycle and pedestrian facilities are not consistent with the function and design of expressways, like Placer Parkway which has been discussed and agreed to by Caltrans during the Project Approval and Environmental Document (PA&ED) for Phase I of Placer Parkway. The County anticipates having 90 percent design plans this fall and is not including pedestrian facilities in the design consistent with prior approvals. Bicycle and pedestrian facilities that are consistent with County functional classification and design standards are provided on parallel roadways, such as Athens Avenue and Sunset Boulevard.

1-3 The comment describes the project's effect on SR 65 and suggests that the project contribute to a list of specific improvements along the SR 65 corridor. The project's impact to traffic operations on SR 65 is disclosed as Impacts 4.14-10 and 4.14-23 in the Draft EIR. Mitigation Measure 4.14-10 describes the project's contribution to improvements of SR 65, including potential auxiliary lanes and a mainline high occupancy vehicle (HOV) lane as identified in the comment. The improvements to the Whitney Ranch Parkway interchange identified in the comment are part of the Placer Parkway Phase I project, which is discussed on page 4.14-49 in the Draft EIR. The Sunset Boulevard interchange already has ramp meters installed.



Sources: adapted by Ascent Environmental in 2019

Exhibit 3-5

PRSP Area External Project Trip Distribution

To clarify what improvements could be funded by an existing or new regional fee program, Mitigation Measure 4.14-10 on page 4.14-86 of the Draft EIR is revised as follows:

> **Mitigation Measure 4.14-10: Contribute fair share of feasible physical improvements to freeway operations (Net SAP Area and PRSP Area)**
> Prior to building permit issuance, project proponents of individual development projects within the SAP area shall be responsible for the project's fair share of all feasible physical improvements necessary and available to reduce the severity of the project's significant traffic impacts to freeway operations as identified in this traffic analysis consistent with the policies and exceptions set forth in the Transportation and Circulation Element of the Placer County General Plan. This may include any, or some combination of, the following forms:
>
> - Payment of impact fees to the South Placer Regional Transportation Authority (SPRTA) in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities funded through fees collected by the SPRTA for Tier 1 and/or Tier 2 projects. This includes the following transportation projects that would directly improve operations on SR 65 and I-80:
>
>   - SR 65 Widening, including auxiliary lanes and a mainline mixed-flow or HOV travel lane
>   - I-80/SR 65 Interchange, and
>   - I-80/Rocklin Road Interchange
>
> - Payment of other adopted and applicable regional impact fees that would provide improvements to freeway facilities that are affected by multiple jurisdictions, such as the Highway 65 JPA Fee, which provides funding for interchange improvements along SR 65.
>
> - Placer County shall coordinate with their regional partners to modify an existing or adopt a new regional fee program to include the improvements identified that will constitute the regions fair share toward the identified improvements. These improvements may include:
>
>   - Add ramp metering to high occupancy vehicle (HOV) lane entrance ramps on SR 65
>   - Add auxiliary lanes to SR 65

1-4 The comment raises issues related to altering drainage patterns and increasing stormwater runoff, such that flooding or other adverse hydrologic effects could occur within the SR 65 right-of-way. The Draft EIR states (page 4.9-31) that protective SAP policies and Placer County permit conditions would require any future development within the project area to implement low impact development (LID) for the 2-year storm event and implement stormwater management measures to reduce stormwater peak flows to below predevelopment levels. Furthermore, the Draft EIR includes Mitigation Measure 4.9-1b, which requires specific details regarding how individual projects would achieve reduction of stormwater flows to obtain an objective post-project mitigated peak flow that is equal to the estimated pre-project peak flow, less 10 percent of the difference, through the installation of detention facilities. Mitigation Measure 4.9-1b also requires mitigation of volumetric increases in stormwater in accordance with Placer County Storm Water Management Manual and/or City of Roseville standards. For these reasons, implementation of the proposed SAP/PRSP would not result in flooding or other adverse hydrologic affects related to Caltrans facilities. No further response is required.

To provide clarification, Mitigation Measure 4.9-1b on page 4.9-32 of the Draft EIR is revised as follows:

> **Mitigation Measure 4.9-1b: Design, construct, and maintain regional stormwater retention and detention facilities or pay retention mitigation fees (Net SAP Area and PRSP Areas)**
>
> The improvement plan submittal and final drainage report shall ~~provide details on how to achieve the following requirements:~~ demonstrate, through the preparation of technical engineering studies, that the increased peak flow and volume of stormwater runoff from the proposed development can be accommodated on-site or in the approved City of Roseville Regional Stormwater Retention Facility and/or other off-site facility. The study shall:
>
> 1. Be submitted to the City of Roseville Public Works Department for review and concurrence in the Net SAP or PRSP is proposing to utilize the City of Roseville Regional Stormwater Retention facility for stormwater retention;
>
> 2. Demonstrate, through the preparation of technical engineering studies, that s~~S~~tormwater run-off peak flows ~~shall be reduced to~~ obtain an objective post-project mitigated peak flow that is equal to the estimated pre-project peak flow, less 10 percent of the difference, through the installation of detention facilities; and,
>
> ~~2~~3. Demonstrate, through the preparation of technical engineering studies, that s~~S~~tormwater volumetric increases are mitigated to retain the increase for the 100-year, 8-day design storm, depth of 10.75 inches at elevation of 200- feet, unless another methodology has been agreed upon by Placer County. The project proponent shall either provide permanent on-site retention or participate in a regional stormwater retention program, if established by the County, by paying retention mitigation fees including maintenance and operation costs, as deemed appropriate, to mitigate the project's increases to stormwater volume. If interim retention facilities are constructed within the PRSP and net SAP areas on parcels zoned for development, the development project would also be subject to payment of the retention fee, in order to fund construction of the ultimate regional retention facility.
>
> Retention and detention facilities shall be designed in accordance with the requirements of the Placer County Storm Water Management Manual ~~and/or City of Roseville~~ standards that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division, and shall be shown in the improvement plans. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.

1-5 The comment notes the required encroachment permits necessary prior to commencing construction within the State right-of-way and/or within the boundary of Pleasant Grove Creek and Auburn Ravine. The appropriate encroachment permits would be obtained in accordance with Caltrans' standards and/or the Central Valley Flood Protection Board prior to commencing construction.

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Letter 2

February 20, 2019

Crystal Jacobsen
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Comment Letter Sunset Area Plan/Placer Ranch Specific Plan SCH No. 2016112012

Dear Ms. Jacobsen:

Please accept the City of Lincoln's comments on the DEIR for the Sunset Area/Placer Ranch project. The City's concerns with the project and the environmental analysis rest primarily with the potential cost to solid waste ratepayers due to residential encroachment within the current 1-mile landfill buffer. The City is also concerned about service impacts on the City of Lincoln by creating a new, urbanized, unincorporated area in South Placer.

Landfill Encroachment - With regard to the Placer Ranch component of the project, the City of Lincoln is supportive of a Sacramento State University satellite campus. We recognize that incentives and concessions may be necessary to secure this important regional asset. However, the landfill is another important regional asset that must be protected. This ratepayer asset is shared throughout the county. We are concerned about reduction in the landfill setback, the lack of quantified analysis, and the lack of appropriate mitigations identified in the EIR. We are concerned that the countywide ratepayers will be subject to unanticipated costs to fight litigation, as well as fund future design and construction of odor elimination improvements that have not been fully identified or discussed in the EIR.

The only analysis in the EIR is a comparison of other landfills, their setbacks, a complaint analysis based on existing development, and suggestion of mitigations used by other landfills, such as misters that might be required based on future complaints. There is no quantified analysis that supports reducing the setback over 80% from 5,280 feet for residential development to as close to 1,000 feet in some instances.

The EIR should identify all improvements that can reduce odor such as enclosing the composting operation and providing an air filtration system, and include engineer cost estimates to implement all identified improvements. The delta between the current landfill CIP and expansion budgets and the cost to implement various unanticipated odor control improvements should be identified. The County should then set up a mechanism to fund those improvements from those who are benefiting from the encroachment. The mitigation does discuss disclosures, but the County should also consider more restrictive legal instruments similar to avigation easements for airports.

2-1

Fiscal Impact Analysis and Revenue Sharing - On October 16, 2016 the Cities of Lincoln, Rocklin and Roseville collectively requested that when the County considered processing a General Plan Amendment for the Sunset/Placer Ranch area that there be agreed upon approach to addressing the fiscal impacts to the surrounding incorporated areas. This approach included an

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Lincoln Community Development Department
600 Sixth Street, Lincoln, CA 95648
(916) 434-2400

agreement between the County and with the adjoining Cities that would specify acceptable levels of service (police, fire, parks, libraries, transit, utilities, etc.) and measures that would mitigate the impacts to the surrounding municipalities. These "level of service" impacts on surrounding cities were to be evaluated in the EIR and discussed in a fiscal impact analysis. Costs and revenues to both the Cities and the County, resulting from the modifications to the County's land use plan were to be considered in such an analysis. We look forward to reviewing the findings of this analysis but believe it should be considered in the service level impacts in the EIR and the fiscal impact analysis should be a supporting document similar to other technical studies.

2-2 cont.

Thank you for your consideration of these comments. The City looks forward to working with the County to secure a university and protect the existing and future landfill expansion area.

Sincerely,

Matthew J. Wheeler, P.E.
Community Development Director

Cc: Jennifer Hanson, Lincoln Interim City Manager
Steve Pedretti, Placer County CDRA Director

~ Lincoln, A City of Opportunity ~

Letter 2	City of Lincoln Matthew J. Wheeler, P.E., Community Development Director February 20, 2019

2-1 The comment raises issues with placing sensitive land uses in proximity to the landfill. See Master Response 4: Odors, which addresses these issues.

2-2 The comment requests a fiscal impact analysis be performed. Service level impacts are evaluated in Section 4.13, "Public Services," of the Draft EIR. Although not a requirement under CEQA, the County has prepared a fiscal impact analysis and financing plan for the PRSP pursuant to its General Plan Policy 4.B.6. The Financing Plan, which includes a summary of service impacts, is included with the package that goes to the Board of Supervisors for their consideration.

ROCKLIN
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Letter 3

February 22, 2019

Ms. Leigh Chavez
Placer County Environmental Coordinator
3091 County Center Drive, Ste. 190
Auburn, CA 95603

Dear Ms. Chavez:

Thank you for the opportunity to review the Draft EIR (DEIR) for the Sunset Area Plan (SAP) /Placer Ranch Specific Plan (PRSP) project. The project location is as follows: The SAP, which includes the PRSP project, encompasses 8,497 acres located in unincorporated south Placer County. The Plan area covers 13.9 square miles between the cities of Rocklin to the east, Roseville to the south, Lincoln to the north and unincorporated Placer County to the west. The Plan area is located immediately west of State Route 65 which connects to I-80 in the south and State Route 99 to the north.

The project proposes to update the 1997 Sunset Industrial Area Plan with a higher density mix of labor- and employment-intensive uses with an emphasis on innovation and creativity. Nested within the SAP, the proposed PSRP includes a mixed-use town center, commercial and office uses, a university site and a diverse housing mix. The project's proposed land uses are as follows: Residential Uses - 801.4 acres consisting of 5,636 dwelling units: Commercial and Employment Uses – 707.7 acres consisting of 8,440,513 square feet; Open Space and Public Uses – 377.5 acres.

The City has completed its review of the DEIR and offers comments as they relate to the overall project and as they to the environmental analysis:

A. Project Description

1. The discussion of Land Use Buffer Zone Standards notes that the principal concern is to balance the needs of employment-supporting uses, a public university, and residential uses with the operational needs of the Western Regional Sanitary Landfill (WRSL) and that revisions to the Placer County General Plan buffer zone standards are proposed. It is our belief and concern, as elaborated upon further in this letter, that the revised buffer zone standards will not adequately protect the landfill. 3-1

CITY OF ROCKLIN Economic and Community Development
3970 Rocklin Rd. Rocklin, CA 95677 | rocklin.ca.us
P. 916.625.5120 | F. 916.625.5195 | TTY. 916.632.4013

B. Air Quality

1. The discussion of Sensitive Land Uses acknowledges that residential dwellings are considered to be sensitive receptors and then notes that the closest sensitive receptors to the project site is a residential development in the City of Roseville adjacent to the southern project area boundary. The discussion should also acknowledge that the project itself has the potential to introduce new residential development and other sensitive land uses in close proximity to WRSL due to the project's proposal to reduce existing landfill buffer distances.

2. Analysis of Project Impacts to the Western Regional Sanitary Landfill (WRSL) and Proposed Buffer Reduction

Landfill Buffer Reduction

It would seem there is an inherent conflict which is unfair to all jurisdictions within Placer County that the same entity which has authority over the decision to reduce buffers applied to the Landfill is also in this case the applicant for the Project. The Landfill is a finite resource (likely not replaceable in Placer County) whose viable operation and protection is essential to all agencies and residents.

Landfill / Odor Analysis

The DEIR's analysis concerning a proposed housing development project near the Western Regional Sanitary Landfill (WRSL) is inadequate as a matter of law, specifically with regards to odors near the landfill and the lack of adequate mitigation measures to guard against exacerbation of such impacts. 3-1 cont.

Although generally CEQA does not require an analysis of existing conditions and its relationship to a project, the exception is when a project risks exacerbating already existing conditions at a project site. (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 [hereinafter "*CBIA*"].) While the County "opts to evaluate and draw significance conclusions" in the DEIR, finding the impact "significant" and that "the project would expose a substantial number of people to objectionable odors," the DEIR still fails to address this exacerbation as a result of the new development. The Project will account for nearly 1/6 of the amount of solid waste that will be handled at the WRSL when compared to current conditions. Long-term build-out conditions would still account for nearly 10% of the total solid waste handled at the WRSL.

In a study published on November 9, 2017, the same consultant for the County concluded that "newly placed waste" is a "contributor to odors." (Ascent Environmental, Review of Odor Management at Western Regional Sanitary Landfill, § 2.1.1, *available at* https://www.placer.ca.gov/~/media/cdr/planning/sunsetindareaplanupdate /wrsl%20odor%20evaluation%202017%20v1-5,-d-,final.pdf?la=en [hereinafter "Review of Odor Management"].) In that study, the County's consultant concluded that "development between the landfill and areas that are already being impacted by odor is likely to result in additional odor issues unless WRSL significantly reduces existing odor emissions." (*Id.* at § 8.0.) Furthermore, the DEIR readily acknowledges that the Project will directly result in an increase in "exceedances of specific odor

levels." (DEIR at p. 4.3-50.) Rather than reduce sources of odor, the County is now seeking to exacerbate those impacts by (1) substantially increasing the amount of odor-causing solid waste handled at WRSL; and (2) exposing the Project's future users to worse conditions than they would otherwise experience.

The fact that the County at one point prohibited development from occurring in proximity to the WRSL, demonstrates at least an awareness of the odor impacts at issue and other sections of the DEIR are again, in direct contrast with section 4.3. In fact, Impact 4.10-2 in Section 4.10 of the DEIR states "Complaints directed at WRSL have been received from residents ***more than 2 miles away***, primarily about odors, with complaints also received about dust, litter, and traffic…" (Emphasis added). The DEIR further admits that "residential encroachment could create pressures on the WRSL operations, resulting in the need to entertain other solutions: diverting waste to another facility, which could be costly and result in environmental impacts, or siting a new facility, which would likely be infeasible given cost, timing and regulatory considerations. (DEIR at p. 4.10-15.) Again, rather than analyze the environmental impacts of those probable results, the DEIR is wholly silent, and consequently, legally inadequate.

Even if the County is correct that the DEIR is "not strictly required to [analyze odor impacts]," the siting and development of a project of this size will most certainly exacerbate odor impacts due to the reduction in the size of the landfill buffer and the placement of sensitive receptors in a closer proximity than currently allowed. The DEIR acknowledges this by stating "…it is expected new residents and users within the project area would be exposed to objectionable odors, would complain about such odors from the WRSL operations, and that the overall number of complaints lodged about nuisance odors would increase." (DEIR at p. 4.3-48.)

3-1 cont.

This is particularly disturbing because the County is acutely aware of the unmitigated, significant, environmental impacts of this project if it is approved as proposed. The County adopted General Plan Policy 4.G.11 precisely to ***protect*** the landfill from incompatible encroachment. That policy states, in pertinent part, "new residential land uses [shall] be separated from the property lines of active and future landfill sites by a buffer of one mile." Despite this policy and one mile buffer, odor impacts exist from outwards of two miles. To now propose reducing that buffer and allow residences to be as close as 1,000 feet is incompatible with the County's existing General Plan, exacerbating already existing conditions at the project site.

The DEIR also notes that Placer County considered the merits of a regional mitigation fee program but determined such to be infeasible. Then, the DEIR asserts that mitigation measures to guard against the risk that the odors at the WRSL site are exacerbated by a reduction in the landfill buffer and introduction of residential uses would be beyond the control of Placer County, yet feasible mitigation measures are available to the WPWMA which owns and operates the WRSL. To place the burden on the WRSL to implement potential mitigation measures is inadequate and improperly imputes the onus of mitigation on the WRSL and its current rate payers rather than the project proponent—the County. When the DEIR does propose measures to offset odor which can be implemented by the County, these measures are limited to specific plan modifications, such as building design and landscape design, and written disclosures to prospective buyers. Disclosures to prospective purchasers may or may not place them on notice of odor issues, but none of these actually mitigate impacts of odor. The

3

"measures" contained in the DEIR fail to address the actual exacerbation of the odors and do not offer alternatives to the Project that would reduce or lessen odor impacts.

The County originally did not plan to develop near the WRSL site and so adopted General Plan Policy 4.G.11. Now that it has decided to do so, it must engage in a thorough analysis of the existing conditions and propose proper mitigation measures to ensure that currently existing odors are not exacerbated, causing the very harms that CEQA was enacted to prevent. These measures should conform with General Plan Policy 4.G.11 and Land Use Policy/ED-10.3: Development Separators. The City is willing to engage in discussions with the County to facilitate an agreement whereby the County mitigates the exacerbation of impacts from the proposed project. 3-1 cont.

For all of these reasons, the Project must adopt additional mitigation measures to address this identified significant impact and not leave the burden of mitigating this significant impact to existing ratepayers.

C. Transportation/Circulation

1. Policy TM-1.9: Additional Traffic Impact Mitigation – It is referenced within this policy that additional traffic impact mitigation could include contribution to funding of transportation system improvements (e.g., traffic fees, VMT fees) and/or dedication of right-of-way for future improvements. It is suggested that this policy also incorporate the concept of payment or construction of off-site mitigations where impacts occur in outside jurisdictions. 3-2

2. The use of a "mall" trip generation rate (26 trips/1000 sf) for the non-residential portion of the Entertainment Mixed Use zone appears to underestimate the actual number of trips that could occur as a result of some potential uses in that zone attracting large crowd volumes. 3-3

3. Figure 4.14-11 – the segment of Whitney Ranch Parkway between SR65 and Wildcat Boulevard is represented as having no change between Existing and Existing Plus Placer Ranch conditions, yet the segment of Whitney Ranch Parkway east of Wildcat Boulevard is projected to have increased volumes despite both roads feeding into it having an increase in volumes. These results should be verified as they appear to be counter-intuitive. 3-4

4. Page 4.14-94 – Land Use Inputs – it is not clear why the buildout of Roseville and County Specific Plans are assumed but not buildout in Rocklin and only residential absorption (i.e., no non-residential) in Lincoln? 3-5

5. Mitigation Measure 4.14-5, Pay impact fees associated with signalized intersections in City of Rocklin to Placer County – 3-6

- Some of the mitigation measures include a component of prohibiting U-turn movements. Because such an option may not be acceptable to the City of Rocklin, we request that other mitigation options be explored that would return the level of service in those locations to an acceptable level.

- The proposed mitigation approach of first requiring development projects within the SAP and PRSP areas to pay fair share impacts fees to Placer County and then Placer County to negotiate with the City of Rocklin to enter into arrangements with Rocklin for

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the provision of adequate fair share funding from the project for significant impacts on City of Rocklin intersections is not the City's preferred approach and does not appear to be in the County's best interests in ensuring that the development project is financially responsible for all of its fair share impact fees. It is preferred that the determination of fair share fees between the City of Rocklin and Placer County should occur first, and then the development projects should pay the as-determined fair share amount.

- The City of Rocklin has no current interest in participating in additional sub-regional or regional approaches to mitigate transportation-related impacts beyond what we currently participate in given our near build-out status. The City evaluates transportation-related impacts from Rocklin development to facilities outside of Rocklin through the CEQA process, and if significant impacts to such facilities are identified, mitigation measures are also identified. 3-6 cont.

- *Adherence to City of Rocklin General Plan Policy C-10*
  The City of Rocklin's Level of Service Policy is presented in the DEIR, however, it should be noted that under Policy C-10(C) impacts created by development in another jurisdiction are to restore the LOS in Rocklin back to "C" unless it is determined by the Rocklin City Council and not another entity that the mitigation is infeasible. In cases where impacts are created by development in an adjacent jurisdiction, mitigation is to be implemented to the fullest extent practicable as determined by the City Council.

  C-10 A. Maintain a minimum traffic Level of Service "C" for all signalized intersections during the p.m. peak hour on an average weekday, except in the circumstances described in C-10.B and C. below.

  B. Recognizing that some signalized intersections within the City serve and are impacted by development located in adjacent jurisdictions, and that these impacts are outside the control of the City, a development project which is determined to result in a Level of Service worse than "C" may be approved, if the approving body finds (1) the diminished level of service is an interim situation which will be alleviated by the implementation of planned improvements or (2) based on the specific circumstances described in Section C. below, there are no feasible street improvements that will improve the Level of Service to "C" or better as set forward in the Action Plan for the Circulation Element. 3-7

  C. All development in another jurisdiction outside of Rocklin's control which creates traffic impacts in Rocklin should be required to construct all mitigation necessary in order to maintain a LOS C in Rocklin unless the mitigation is determined to be infeasible by the Rocklin City Council. The standard for determining the feasibility of the mitigation would be whether or not the improvements create unusual economic, legal, social, technological, physical or other similar burdens and considerations. 3-8

- *Global Comment – Traffic Mitigation Measures/Secondary Impacts*
  CEQA requires identification of the impacts created by proposed mitigation measures. In areas where widening, lane additions or other reconfigurations are suggested to 3-9

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mitigate traffic impacts, graphics should be provided that are superimposed over aerials to clearly show the extent of the physical impacts (i.e., to landscaping, driveways, utilities, parking as well as modifications to other portions of the intersection that would be necessary to create receiving lanes, etc.) that would result from the proposed improvements so that the public, affected agencies, and decision makers can be fully informed regarding these secondary effects and fairly evaluate their true feasibility. 3-9 cont.

- *Pacific Street / Sunset Boulevard*
  The proposed mitigation measure is unclear and potentially incomplete with regard to the improvements that are identified. There is currently an eastbound left turn lane and left turn/through lane on Sunset to Pacific. If the measure is suggesting that two left turn only lanes are needed, then the roadway would require considerable widening to replace the current through capacity being eliminated. Depending upon how far back the two left turn lanes need for queuing, it could also require widening of the Sunset Boulevard overcrossing of the railroad and may create the need for additional widening for receiving lanes on the other side of the intersection. Also see prior general comment regarding the need for graphic depictions and analysis of the secondary effects of proposed mitigation measures. 3-10

6. Impact 4.14-10 Impacts to freeway operations - Most of the impacts on State Route 65 and I-80 are adjacent to Rocklin and Roseville. The traffic analysis assumes all currently planned and programmed improvements to Highway 65 and I-80 are constructed and yet in the cumulative scenario many mainline segments of those facilities are still projected to function at extremely low Levels of Service, in fact LOS F in many locations. The payment of regional fees approach does not work in that scenario and the DEIR does not appear to identify any mitigation for PRSP and SAP project specific impacts to state facilities. The study asserts that a certain percent of traffic that would otherwise use state facilities will deviate to local streets in Rocklin and Roseville and that those volumes have been accounted for. However, given the extremely poor projected LOS on SR 65 in particular, we are concerned that the percentage of trips that will actually divert to local streets will actually be much higher. The assumptions for such deviations should be revisited. 3-11

The scale of the project seems to be well beyond what existing or planned improvements to state facilities can accommodate. Perhaps the densities and intensities of proposed land uses in the SAP / PRSP areas should be scaled back to better coincide with the capacities of the infrastructure that will be available. This is completely within the County's control, therefore, findings that impacts to various traffic facilities are significant and unavoidable is not accurate. As an example, the City of Rocklin adopted "Trip Caps" as part of the North West Rocklin General Development Plan to ensure that future development within the Highway 65 Corridor would not exceed established LOS standards. Such an approach or a reduced intensity land plan should be seriously considered.

7. Mitigation Measure 4.14-18b, Pay fair share cost toward modifying Pacific Street/Sunset Boulevard intersection (Net Sap Area and PRSP Area) – similar to the concern noted above regarding mitigation for this same intersection, the proposed mitigation measure is unclear and potentially incomplete with regard to the improvements that are identified. There is currently an eastbound left turn lane and left turn/through lane on Sunset to Pacific. If the measure is 3-12

6

suggesting that two left turn only lanes and a shared through-left turn lane are needed, then the roadway would require considerable widening to replace the current through capacity being eliminated. Depending upon how far back the two left turn lanes and shared through/left turn lane need for queuing, it could also require widening of the Sunset Boulevard overcrossing of the railroad and may create the need for additional widening for receiving lanes on the other side of the intersection. Also see prior general comment regarding the need for graphic depictions and analysis of the secondary effects of proposed mitigation measures. 3-12 cont.

8. Traffic Associated With Entertainment Venues and Theme Parks

One other note of concern is related to the Entertainment Mixed-use Zoning District. Exhibit 3-6 notes further "sub-zones" of EMU-AD, EMU-CD and EMU-SD, but does not provide any standards that differentiate these sub-zones. Of primary concern would be the uses that would likely fall under the EMU-AD (Attraction District). As noted, EMU uses include entertainment venues and theme parks. These uses, depending on their specific nature, can be huge traffic generators for very specific time periods (i.e., concert start and end times) and could severely impact Highway 65 and Sunset, specifically. It is also unclear how and if these types of uses have been accounted for in the traffic analysis. Although not necessarily feasible to size these roadways for "concert-level" traffic, a policy that requires site design of large-scale entertainment facilities to remove traffic off local roadways as quickly and efficiently as possible as well as disperse traffic back onto roadways in a controlled manner should be considered. 3-13

In addition, it was noted for traffic analysis purposes that the trip generation rate used for the non-residential portion of the EMU District was "Mall" at 26 trips per one thousand square feet. Based upon the description of the EMU District and the potential land uses anticipated to be located there, the concern is that a "Mall" trip generation rate significantly underestimates the potential trip generation rate of the type of regionally attracting use that could be located in the EMU District and a higher trip generation rate should be used for conservative purposes.

9. There is concern with Policy TM-1.9 in that it allows all projects in the PRSP/SAP area to not undergo additional traffic analysis if the development projects are deemed to be consistent with the land use assumptions of the EIR. Given that the it is acknowledged in the EIR that buildout of the SAP would occur over 80+ years and the Cumulative Plus PRSP Plus SAP (20-Year Project) scenario only includes a 20 year buildout horizon based on a market analysis, there is a 60+ year gap in the cumulative year traffic analysis. To truly capture the incremental traffic impacts for projects that are developed beyond what was assumed in the 20- year development horizon, it is suggested that Policy TM-1.9 be adjusted to acknowledge that if future land development beyond what was assumed in the 20 year development horizon is proposed, those development projects will require additional traffic analysis and mitigation of impacts identified in the analysis. 3-14

D. Public Safety

Fire

It is difficult to quantify the project's impacts to Rocklin Fire and the City's Emergency Response System. The document discusses that the need for fire protection and emergency response 3-15

services will increase, including an increase in the demand for additional firefighters, but it does not discuss how they will be deployed. It is noted that new development would be annexed into an existing CFD or a new CFD, but ideally the development of all ultimately needed fire station facilities would be front loaded and staffing increases tied to specific development milestones so that adjacent communities will not have to absorb the need to provide services since the current plan is a pay/build as you go model. One concern that does not appear to have been addressed is the impact of additional traffic on major arterials and State Route 65 including how that affects Rocklin Fire's response model. As congestion increases it has a direct impact on Fire and medical emergency service response times.

3-15 cont.

Law Enforcement

Unlike a fire department model, law enforcement assigns officers to an onsite specific geographical location for service through beats, as opposed to responding from a particular station. However, lacking a substation in the vicinity, calls for back-up could be requested from other Sheriff Department personnel or adjacent jurisdictions. Ideally a Sheriff's substation would be planned within the SAP/PRSP area at this time and the County would front load investment in that infrastructure so that adjacent communities will not have to absorb the need to provide services since the current plan is a pay/build as you go model. County service levels are difficult to predict, but we do not anticipate the proposed development would have an over extending need for additional law enforcement assistance from the Rocklin Police Department, beyond routine. However, mitigation language should acknowledge that if future service requests were deemed beyond routine, the Police Chief would need to meet with the Sheriff and discuss providing assistance, above routine, moving forward. Requests for outside law enforcement assistance, above routine are currently covered under the California Master Mutual Aid Plan which operates out of both the County and the State Office of Emergency Services.

3-16

Prospective issues with this development that could potentially effect law enforcement within the City of Rocklin stem from the traffic generated by the development and the traffic associated with a 4 year University. With the current layout of State Route 65, traffic congestion is already well beyond the norm. Adding the possibility of tens of thousands of new vehicle trips a day could theoretically force vehicles off of State Route 65 onto surface streets in to the surrounding cities including Rocklin. More vehicle trips on City streets brings the possibility of more accidents and/or demands for other law enforcement related traffic enforcement. In addition, this extra traffic could impact our response times and road quality causing our roads to fail faster than originally anticipated. These issues do not appear to have been currently addressed in the DEIR.

E. <u>Drainage</u>

It is our understanding that Rocklin drainage has been factored in the estimation of regional off-site drainage capacities and if so, is development of the SAP / PRSP diminishing the capacity of regional facilities and causing the need for increased capacity improvements beyond those already planned? If so the SAP / PRSP development should be responsible for funding both the Planning and implementation of expanded improvements beyond those that are already planned.

3-17

F. Alternatives

The Alternatives analyzed in the DEIR are not adequate and should include a scenario with a land plan that implements the current 1 mile buffer from the landfill for sensitive uses including all new residential as well as the University Campus. 3-18

***G.* Off Setting Development Impacts**

Text regarding "Consultation with Neighboring Cities" on page 4.15-33 currently discusses the following Draft Policy PF-2.9 in the SAP: "The County shall consult with the Cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area." Rocklin staff is unclear regarding the intent of this policy and how it would actually become an issue. For example, if land use plans within the Cities remain as currently adopted, it appears there would be no impacts to the SAP. Perhaps at minimum the language should be clarified to specifically address any future land use changes that result in significant increases in density or intensity, although again the specific type of impacts to the SAP are unclear. Staff would also note that since the year 2000 the City of Rocklin has already been collecting Placer County Capital Facilities Impact Fees on all residential and non-residential development projects in the City to off-set impacts to various County services and facilities. In fact, this type of model in reverse should be seriously considered as a more effective means for the County to off-set some, if not all, impacts to adjacent cities that will be created by the SAP/PRSP developments and we invite further discussion of this concept. Ideally a commitment to collect and transmit such impact fees to the Cities would be executed and implemented prior to any actual development being approved in the PRSP / SAP areas. 3-19

Thank you again for the opportunity to provide our comments on the Draft EIR. If there are any questions regarding the above comments or if you would like to discuss any of the comments further, please do not hesitate to ask. Staff looks forward to a continuing dialog with Placer County.

Sincerely,

David Mohlenbrok
Community Development Director

cc: City Manager
Assistant City Manager
City Councilmembers
City Attorney's Office
Laura Webster, Director of Long-Range Planning
Dave Palmer, City Engineer

9

Letter 3	City of Rocklin David Mohlenbrok, Community Development Director February 22, 2019

3-1 The comment states that the EIR "discussion should also acknowledge that the project itself has the potential to introduce new residential development and other sensitive land uses in close proximity to WRSL due to the project's proposal to reduce existing landfill buffer distances." To clarify, as explained on Draft EIR page 4-3, "the baseline conditions for this Draft EIR are generally the conditions that existed in the SAP area in 2016," consistent with State CEQA Guidelines Section 15125(a). The Draft EIR explains that "[t]his setting generally serves as the baseline against which environmental impacts are evaluated." Therefore, the Draft EIR properly analyzes impacts associated with the landfill against existing conditions and existing sensitive receptors, not sensitive receptors that may exist in the future. Note, too, that the discussion of Impact 4.10-2 considers how future sensitive receptors would potentially result in impacts related to incompatibility of the WRSL with the proposed project. The issues raised by the commenter regarding the Draft EIR's odor analysis in the Air Quality section are addressed by the Draft EIR's discussion of land use compatibility in the Land Use section (Impact 4.10-2). Ultimately, the comment indicates that additional mitigation measures should be adopted and that the cost burden should not be left to taxpayers. See Master Response 4: Odors for a detailed discussion of the Draft EIR's analysis of odor and land use impacts and for other details related to WRSL operations. Master Response 4 includes additional mitigation measures, including fair-share funding for odor reduction measures that would be implemented be WPWMA.

3-2 The comment suggests that Policy TM-1.9 incorporate payment towards or construction of off-site mitigations where impacts occur outside Placer County. Policy TM 1.9 has been modified to require that traffic impact studies be prepared for future development projects that are proposed after the 20-year level of development has been reached. See response to comment 4-13 for additional details and the specific revisions to the policy.

3-3 The comment expresses concern regarding the trip generation rate used for the EMU zone of the SAP. Fehr & Peers conducted a trip generation evaluation for the EMU area that compared the number of EMU trips included in the traffic modeling with the trip generation of regional retail, recreation, and conference center uses (i.e., the type of uses allowed in the EMU district). Based on this evaluation, the number of EMU daily trips reflected in the Draft EIR traffic analysis adequately covers the EMU area. The EMU trip generation in the Draft EIR is 2.7 times more than the number of daily trips generated by the Westfield Galleria at Roseville shopping mall and more than 10 times more than the Sacramento Convention Center. Furthermore, this evaluation showed that where relevant floor area data was available, the daily vehicle trip generation rate for these regional retail, recreation, and conference center uses was less than the 26 daily trips per KSF used in the Draft EIR traffic modeling.

At this time, it is speculative to include a large capacity event venue in the traffic modeling as it is not specifically proposed as part of the project and is only one of many potential uses that could be considered in the EMU district. Also, the nature of "special events" is that they occur infrequently and should be handled accordingly. The County will require a more detailed traffic analysis if a venue is proposed that is capable of hosting large special events that attract occasional large crowd volumes. Since the Draft EIR was released, the County added a new policy to the SAP that requires traffic management procedures for special events, including notification to adjacent jurisdictions and notification of temporary closures or alternative routes.

3-4 The comment expresses concern regarding the change in ADT on Whitney Ranch Parkway presented in Exhibit 4.14-11 on page 4.14-47 of the Draft EIR. See response to comment 1-1 regarding the project's anticipated redistribution of existing trips. This redistribution is anticipated to shift some trips from Wildcat Boulevard to Industrial Avenue, as shown in Exhibit 4.14-11. There is also a very

minor effect on existing volumes on Whitney Ranch Parkway east of Wildcat Boulevard (slight increase from 6,500 to 6,600 ADT) as a few trips from Whitney Ranch shift to travel to new destinations west in the PRSP area.

3-5 The comment raises a question regarding the land use inputs used in the cumulative traffic analysis presented on page 4.14-94 of the Draft EIR. As described on page 4.14-93 of the Draft EIR, the land use inputs for the cumulative traffic analysis considers the SACOG 2036 projections. SACOG's 2036 projections do not anticipate buildout of the Lincoln General Plan, hence 2036 levels of market absorption are included for both residential and non-residential uses. Similarly, Rocklin's non-residential capacity is not expected to buildout by 2036; but residential buildout is included. Full buildout of the City of Roseville is necessary to remain consistent with the City of Roseville's analysis of Amoruso Ranch. Similarly, the Amoruso Ranch EIR included buildout of the Regional University Specific Plan and Phase 1 of Placer Vineyards in Placer County.

3-6 The comment expresses concern regarding Mitigation Measure 4.14-5, which includes prohibiting U-turn movements and the payment of fair share impact fees. As described in Impact 4.14-18 of the Draft EIR, the cumulative traffic analysis shows that U-turn prohibitions at City of Rocklin intersections would not be necessary when reasonably foreseeable regional roadway improvements are considered. The traffic generated by the proposed project would occur over an extended period of time, and the 20-year land use development totals that are included in the Draft EIR's cumulative plus project analysis would occur together with these regional roadway improvements. Mitigation Measure 4.14-5 requires the payment of fees associated with signalized intersections in the City of Rocklin. Placer County, in working with the City of Rocklin in good faith to provide for funding of improvement not already subject to an existing interagency fee program, has incorporated language into the PRSP Development Agreement to provide fair-share funding for improvements at City of Rocklin locations. Development within the net SAP area would be subject to the mitigation measure.

3-7 The comment requests that mitigation measures improve the LOS at intersections impacted in the City of Rocklin to LOS C per Policy C-10 in the City of Rocklin General Plan. Implementation of Mitigation Measures 4.14-18a and 4.14-18b would mitigate the project's cumulative effect at City of Rocklin intersections by restoring traffic conditions to their Cumulative No Project LOS or better and, therefore, the project's cumulative effects have been adequately addressed per CEQA requirements. Identifying further improvements that address LOS shortfalls not caused by the project is not required.

3-8 See response to comment 3-7 regarding the application of the City of Rocklin General Plan Policy C-10 in light of CEQA requirements.

3-9 The comment requests that graphics be prepared that superimpose proposed widening, lane additions, or other reconfigurations identified in the Draft EIR mitigation measures at City of Rocklin intersections over existing aerial photos to demonstrate how they would conceptually be implemented. The improvements identified in Mitigation Measures 4.14-18a and 4.14-18b were overlaid on aerial imagery of the identified intersections to verify their feasibility. This evaluation determined that the improvements in Mitigation Measure 4.14-18a can be completed as a striping improvement with no physical widening of the roadway. See response to comment 3-10 regarding the improvements described in Mitigation Measure 4.14-18b.

3-10 The comment requests further explanation of the proposed improvements to the Pacific Street/Sunset Boulevard intersection identified in the Draft EIR's mitigation measures. The improvements identified at the Pacific Street/Sunset Boulevard intersection in Mitigation Measure 4.14-18b were overlaid on aerial imagery to verify their feasibility. This evaluation determined that the improvements in Mitigation Measure 4.14-18b could be implemented as a striping improvement with no physical widening of Sunset Boulevard and Pacific Street beyond what is already anticipated in the Rocklin General Plan and included in the Cumulative No Project scenario.

3-11 The comment expresses concern regarding the amount of traffic that would divert onto Rocklin streets to avoid traffic congestion on SR 65 and the resulting impact of this traffic. The comment further suggests that the proposed land uses be scaled back or a "trip cap" be established to reduce congestion on SR 65. As described on page 4.14-131 of the Draft EIR, the traffic forecasting models used in this analysis includes improvements to SR 65 and Interstate 80 (I-80) that are included in the financially constrained project list in the SACOG 2036 MTP/SCS. As described on page 4.14-96 of the Draft EIR, these cumulative traffic forecasts reflect the resulting travel patterns that are caused by the congested conditions on SR 65 with these SACOG 2036 MTP/SCS financially constrained projects. This includes an increase in trips using parallel local streets (e.g., Industrial Avenue, Wildcat Boulevard) in response to the forecasted congestion. The amount of traffic using local streets is based on outputs from the Placer County travel forecasting model, the standard model used to forecast traffic volumes in this geographic area.

The comment expresses concern regarding traffic impacts under the cumulative traffic scenario and suggests that the densities and intensities of the proposed land uses should be scaled back to better coincide with the capacities of infrastructure (transportation) that will be available and points to the use of "Trip Caps" as a way to address the issue. In response, SAP Policy TM-1.9 Additional Traffic Impact Mitigation has been modified. See response to comment 4-13.

3-12 See response to comment 3-10 regarding explanation of the proposed improvements to the Pacific Street/Sunset Boulevard intersection identified in Mitigation Measure 4.14-18b.

3-13 See response to comment 3-3 regarding explanation of the proposed improvements to the Pacific Street/Sunset Boulevard intersection identified in Mitigation Measure 4.14-18b.

3-14 See response to comment 3-2 regarding the proposed changes to Policy TM-1.9 and the additional traffic analysis required of projects that exceed the EIR's projected 20-year development totals.

3-15 The comment suggests that the public services analysis should have discussed how additional firefighters would be deployed. The comment also suggests that the development of all necessary fire station facilities should be tied to specific development milestones. The comment expresses concern about the impact to Rocklin's emergency response times with additional project traffic on major arterials and SR 65.

As required by Mitigation Measures 4.13-1a and 4.13-1b in the Draft EIR, project proponents shall annex into an existing County Service Area (CSA) Zone of Benefit or create a Community Facilities District (CFD) to fund the revenue required for operations, training, maintenance, and personnel costs associated with maintaining the staffing ratios identified in Table 4.13-5 on page 4.13-24 of the Draft EIR. Additionally, Mitigation Measure 4.13-1b requires a new fire station to serve the project. These mitigation measures include timing and performance standards and would reduce impacts to a less-than-significant level. In addition, Placer County Fire oversees protection planning and fire and emergency services for the County. The first fire station already exists in the net SAP area and is known as Station #77. PRSP Parcel PR-71 has been identified as a potential site for the second station or any parcel within the PRSP area with a General Commercial Mixed Use, or Campus Park land use designation. The PRSP area would annex into the Placer County Fire Facility Fee Program which provides a mechanism to fund the construction of fire facilities needed to serve new growth areas. The net SAP area is already within the Placer County Fire Facility Fee Program and all new development would pay its corresponding fee at the time of building permit issuance. Placer County Fire anticipates that the second fire station would be needed around 25 percent buildout of PRSP or as otherwise determined by the County. County staff would work with Placer County Fire to determine the appropriate time for planning and construction for the second fire station within the PRSP area.

Regarding congestion-related effects to emergency response times, provision of additional emergency service facilities and personnel required by mitigation measures discussed above, as well as mitigation measures identified in the Draft EIR to reduce project-related traffic congestion would also reduce effects to emergency response times. The Draft EIR also includes mitigation measures requiring preparation of a construction management plan to minimize the potential for project-related construction activities to interfere with emergency response (Draft EIR page 4.8-39).

To provide additional clarity regarding timing, Mitigation Measure 4.13-1b on page 4.13-27 of the Draft EIR is revised as follows:

> **Mitigation Measure 4.13-1b: Fire stations (Net SAP Area and PRSP Area)**
> A minimum of two fire stations ~~shall be constructed~~ are needed to serve the net SAP and PRSP areas. Both fire stations will be located within the SAP/PRSP area and shall be fully funded and equipped. ~~The specific locations for the fire stations and fire station design will be identified in coordination with the Placer County Fire Department.~~ The first fire station already exists in the net SAP area and is known as Station #77. PRSP Parcel PR-71 has been identified for the second station or any parcel within the PRSP area with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. The fire station~~s~~ will be constructed as needed to serve development and maintain staffing ratios. Placer County Fire anticipates that the second fire station will be needed at approximately 25 percent buildout of the PRSP. The second fire station's location, design, and construction will be identified in coordination with Placer County Fire, and the fire station will be constructed as its necessity as determined by the County based upon development and staffing ratios. The timing and triggers for construction of the fire station are outlined in the PRSP Development Agreement. Funding shall be provided pursuant to Mitigation Measure 4.13-1a.

3-16 The comment suggests that a sheriff's substation should be planned within the SAP area. The comment also requests mitigation language acknowledging the need for the City of Rocklin Police Chief to meet with the Placer County Sheriff should service requests associated with the project area extend beyond routine levels. The comment also suggests that additional traffic generated by the project, particularly Sac State–Placer Center, would increase the possibility of additional accidents on Rocklin streets and could create the need for additional law enforcement services, additional road maintenance, and a decrease in Rocklin emergency response times.

As noted on page 4.13-28 of the Draft EIR, a sheriff's substation is currently identified to be located in the Placer Vineyards Specific Plan area, approximately 5 miles southwest of the project area. This substation, once developed, would serve the project area and accommodate the anticipated staff needs for the project area. The Sac State—Placer Center would include its own law enforcement staff and would not increase demand for law enforcement in the area.

See response to comment 3-15 for information regarding congestion-related effects to emergency services.

3-17 The comment questions whether the use of the Pleasant Grove Retention Facility by the project for volumetric stormwater retention would diminish capacity of the facility to accommodate other development in the region that are programmed to use the facility. The Draft EIR evaluates the impacts associated with a re-designed retention basin that includes the necessary increase in capacity for the proposed project beyond what was previously approved and evaluated in the City's EIR. The Draft EIR states (page 3-69):

> Although the City's proposed volumetric retention basin was evaluated at a program-level in an EIR prepared by the City, the SAP/PRSP project would require expansion of the facility beyond its current approved design. This EIR evaluates the potential environmental impacts associated with a larger retention facility. It should be noted, however, that the City of

Roseville, or County/City JPA (or other agreement) would be the CEQA lead agency for the Pleasant Grove Retention Facility project, and additional CEQA review would be required before the facility could be constructed.

Other development that would rely on volumetric retention capacity at the Pleasant Grove Retention Facility that would be beyond the capacity designed and evaluated in the City's previous EIR was not included in the design assumptions for the retention facility evaluated in the SAP/PRSP Draft EIR. Such capacity exceedances and associated increases would need to be evaluated in CEQA documents associated with those other developments.

3-18 The comment states that the Draft EIR should have analyzed an alternative that implements the current 1-mile buffer from the landfill for sensitive uses including all new residential as well as the University campus. See Master Response 1: Alternatives Analysis for a general discussion regarding the adequacy of the Draft EIR's alternatives analysis. Master Response 2: Citizen-Initiated Smart Growth Plan describes the constraints related to an alternative design that maintains the 1-mile landfill buffer. As described in the master response, the 1-mile buffer around the centrally located WPWMA property, excludes the entire center of the SAP area, leaving only the corners and edges for development of sensitive land uses (including the Sac State–Placer Center, other schools, and residential land uses). Much of the land in these areas is currently developed with industrial and warehouse uses. In essence, the resulting alternative would closely resemble the 1997 SIA Plan, which is already included in the Draft EIR's alternatives analysis as the No Project Alternative.

3-19 The comment requests clarification on SAP Draft Policy PF-2.9 and references the collection of Capital Facility Fees. SAP Policy PF 2.9 has been deleted in the Final SAP. To reflect this change in the Draft EIR, the fourth bullet on page 4.13-22 of the Draft EIR is revised as follows:

- ~~**Policy PFS-2.9: Consultation with Neighboring Cities.** The County shall consult with the cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area.~~

Also, the fourth bullet on page 4.15-33 of the Draft EIR is revised as follows:

- ~~**Policy PFS-2.9: Consultation with Neighboring Cities.** The County shall consult with the cities of Roseville, Rocklin and Lincoln to require new development within city limits to mitigate impacts on facilities and services within the Sunset Area.~~

The City of Rocklin collects the Countywide Capital Facility fee to mitigate impacts from new growth on countywide facilities that provide general governmental services to residents who live in Placer County pursuant to Resolution No. 200-108 adopted by the Rocklin City Council and the Fee Collection Agreement entered into by the City of Rocklin dated July 10, 2000. See also Master Response 9: Mitigation and Development Fees.

CITY OF ROSEVILLE CALIFORNIA
CITY MANAGER
311 Vernon Street
Roseville, California 95678-2649

Letter 4

Shirlee Herrington
Placer County Planning Services Division
3091 County Center Drive, Suite 190
Auburn, CA 95603
Email: cdraecs@placer.ca.gov

February 22, 2019

Re: Comments on the Sunset Area Plan and Placer Ranch Specific Plan (SAP/PRSP) DEIR

Dear Ms. Herrington,

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for a program-level analysis of the Sunset Area Plan (SAP) Update and a project-level analysis of the Placer Ranch Specific Plan (PRSP). This cover letter summarizes the City's areas of concern. More detailed comments are included as Attachment 1 to this letter.

The City would like to reemphasize its specific support of a university project in South Placer County and of the PRSP development concept in general. Throughout the process of developing the specific plans, commenting on the Notice of Preparation, and providing feedback on the Administrative Draft DEIR, the City has repeated its commitment to working in cooperation with Placer County on this important project. However, the City had previously requested that the description of the impacts to the City—and the mitigation measures to reduce or avoid those impacts—be fully disclosed and discussed in advance of DEIR publication, so that the measures identified in the DEIR are fully enforceable and agreed to by the City. Unfortunately, the City's concerns have not been adequately addressed. As such, it is the City's obligation to strongly express its concerns in this DEIR comment letter, as there will be significant environmental effects caused by the project in Roseville which remain unmitigated despite the availability of feasible mitigation measures. 4-1

The City has found the analysis and mitigation contained in the DEIR to be inadequate. The DEIR should be revised and recirculated to address the concerns outlined in this letter, and should also be recirculated with the fiscal analysis and proposed development agreements for the project, which should include the requirement to implement applicable mitigation measures identified in the DEIR. The City respectfully requests the opportunity to develop mutually-agreeable, adequate mitigation and the opportunity to review and provide input on the fiscal analysis and development agreements, prior to the recirculation of the DEIR.

The County published a staff report which listed areas of controversy and held a public hearing on the DEIR on February 14, 2019, at which a City representative provided oral comments. Of the twenty areas of known controversy, the City is particularly concerned with twelve, as follows:

- **Odor-related impacts**: The project includes an amendment to the Placer County General Plan's Solid Waste Public Facilities Buffer Standards to reduce the residential buffer zone of the landfill from one mile to 2,000 feet (or 1,000 feet on a case-by-case basis). Placer County General Plan Policy 4.G.11 further states: "When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area." The DEIR analysis acknowledges that reducing the landfill buffer could cause odor impacts and lead to incompatible land uses, which would create a need for solutions which are extremely costly or even infeasible, but concludes that because Placer County does not control the landfill, mitigation is infeasible. This conclusion is incorrect. 4-2

Payment of fair share fees is a feasible mitigation measure which would allow the landfill to make needed modifications, and should have been examined in the DEIR.

In addition, the project analysis of landfill impacts is limited to an analysis based on the existing condition. However, landfill expansion is a reasonably foreseeable project, and conceptual layouts for the expansion have been available since 2016 (see the Western Placer Waste Management Authority website: https://www.wpwma.com/) but the DEIR analysis does not examine the impacts of the project compared to the expansion. The DEIR must include this cumulative analysis in order to comply with CEQA; please revise the DEIR to include this cumulative analysis. 4-2 cont.

- **Transportation impacts:** The City's General Plan Circulation Element, page III-33, includes Level of Service Policy 1, which requires a Level of Service standard of "C" at a minimum of 70% of all signalized intersections and roadway segments. According to the DEIR, the project will cause PM peak hour operations in Roseville to drop from 84% to 68% of intersections operating at Level of Service C (LOS C) or better. As a result, the proposed project will have a significant traffic impact and it will cause the City's traffic network to be inconsistent the City's General Plan. Furthermore, the DEIR identifies more than 40 mitigation measures which are not within the City's Capital Improvement Plan (CIP); therefore, there is no substantial evidence that the County has committed to ensuring that the proposed mitigation measures are fully enforceable. This is a significant concern to the City and is not adequately addressed within the DEIR. 4-3

  Furthermore, Mitigation Measure 4.14-3 and 4.14-4 describe a fair-share fee program to offset the impacts to City of Roseville facilities that is not well-defined. The City has been requesting that the County work cooperatively with the City to craft mutually agreeable transportation mitigation measures since issuance of the NOP. These measures could have been better defined for review by the public by the time of publication of the DEIR, but the County elected not to coordinate acceptable traffic mitigation measures. The City is very concerned that the language presented in the DEIR about negotiating in "good faith" within a "reasonable time" does not commit the County to specific, feasible actions to offset impacts to City facilities and is, therefore, not enforceable mitigation.

- **Foothills Boulevard:** The DEIR fails to disclose that the Foothills Boulevard extension is a required project improvement, both on- and off-site. This critical roadway needs to be identified as a project responsibility and evaluated at a project-level to ensure that the improvements are feasible. The DEIR must analyze the entire off-site portion of the proposed Foothills Boulevard, which is a reasonably foreseeable improvement. Failure to include the project-level analysis in the DEIR jeopardizes the ability to obtain the necessary funding and right-of-way dedications. The DEIR indicates that 50% of the PRSP could be developed before this connection is needed and that 75% of PRSP would need to be built before the necessary funding is available. The City takes strong exception to the assessment of need. As explained in more detail in Attachment 1 of this comment letter, the impacts to Fiddyment Road and Woodcreek Oaks Boulevard are substantially underestimated in the modeling and therefore the Foothills Boulevard extension may be essential to mitigating impacts to Roseville roadways. As a result, the DEIR analysis of when this required facility will be necessary is significantly misstated. This improvement will be needed significantly earlier than indicated in the DEIR. Additionally, the City takes issue with the fact that the DEIR does not speak directly to the timing and funding of the roadway connection and bridge construction costs. 4-4

- **Public services:** The analysis has deferred detailed consideration of impacts on police/emergency services, fire services, and library services. All of the public service analysis in the DEIR acknowledges that the project will increase demands on these public services, but it does not identify locations for new or expanded facilities or the environmental impacts of such facilities. The mitigation does not include triggers for the timing of construction or include any performance standards. The project as proposed is very likely to result in increased demands on City services and require facility 4-5

expansions within Roseville. Roseville residents recently passed a sales tax measure (Measure B) to preserve—and in some cases restore—public service levels within the City. As currently proposed, the project would create an unfunded increase in City service demands; Roseville residents should not have to pay for services and expanded facilities required to support the project. The DEIR analysis and mitigation should be revised to ensure the project will meet anticipated service demands, in order to avoid impacts to City services and facilities. 4-5 cont.

- **Public recreation and parks:** The analysis in the DEIR has not demonstrated that all required parkland is being provided to support the entire project. The analysis provides parkland credit to private facilities which are not publicly-accessible, and does not include the residential units contained within the SAP in its calculations. It also does not provide sufficient recreation facilities to meet County standards. All of this will result in the increased use of City park facilities, which will contribute to substantial physical deterioration of City park sites and the need to make physical improvements, without adequate funding sources. 4-6

- **Utilities Distribution and Treatment Capacity:** The DEIR fails to consider cumulative impacts related to both the landfill and wastewater impacts. Regarding the landfill, the DEIR does not analyze the proportional increase in solid waste generated by the Project and by full build out of the SAP, and its effects on the life-span of the landfill. Regarding wastewater, the DEIR compares the projected project wastewater flows to the current Pleasant Grove Wastewater Treatment Plan flows, rather than to the build-out flow conditions. As a result, the complete project impacts to the treatment plant are undisclosed in the DEIR. 4-7

- **Stormwater drainage facilities:** Implementation of the project would require construction of the planned Pleasant Grove Retention Facility in the City of Roseville, as stated on multiple pages within the DEIR (e.g. DEIR page 4.9-28). However, Mitigation Measure 4.9-1b is not sufficient, because it does not require payment of fair-share fees to the City, establish or discuss operational and maintenance funding, and does not reference the Pleasant Grove Retention Facility. 4-8

- **Conflicts with planned facilities:** As stated previously, the DEIR does not examine the project in light of the planned landfill expansion, and it also does not require right-of-way dedication for Placer Parkway. 4-9

- **Aesthetic impacts:** This is a significant new development area, which allows up to 150-foot-tall structures in the Innovation Center and up to 225-foot-tall structures in the Commercial Recreation, Hotel, and Hotel Resort land uses. The City of Roseville shares three miles of common border with the project area, but despite this fact the analysis in the DEIR only includes a single vantage point in the City, which is taken from Fiddyment Road at one limited angle of view. No photosimulations are provided, which makes it difficult to understand the scope of the impacts. The DEIR includes images from only a handful of viewing locations, which are not representative of actual viewpoints observed by the most affected viewer groups; has provided photos which are of limited scope/direction and do not represent the actual view of a person standing at the viewpoint; and have been taken from locations which ensure there are intruding visual encroachments in the foreground that distorts the actual view which would be experienced. 4-10

- **Project phasing and timeline:** The City is deeply concerned about the timing of mitigation measures in relationship to the timing of project phasing and construction. Many of the mitigation measures do not include development triggers or other timing mechanisms to ensure that needed mitigation occurs before or at the time of project impacts. 4-11

- **Noise:** The DEIR includes mitigation related to the City's Roseville Power Plant 2, but this mitigation does not include specific performance criteria to ensure that adequate sound attenuation would be achieved. 4-12

In addition to the concerns identified regarding areas of known controversy, the City has serious concerns about the cumulative impacts analysis of the project. Page 4-1 of the DEIR states that two levels of analysis are provided: project-level for the PRSP, and program-level for the SAP and University. Under the guise of providing a "program-level" analysis, this DEIR defers required analysis of known project details to a later date. While citing California Environmental Quality Act (CEQA) Guidelines Section 15168(a) to support this approach, the DEIR neglects to account for Section 15168(b), which states that the program EIR can "provide an occasion for a ***more exhaustive consideration of effects and alternatives*** than would be practical in an EIR on an individual action," and "***ensure consideration of cumulative impacts*** that might be slighted in a case-by-case analysis." [emphasis added] The Program EIR option does not exist as a means of avoiding detailed analysis, as this EIR seems to imply; it exists as a means to streamline later analysis of subsequent actions by providing a comprehensive and connected analysis. 4-13

As an example, although modifications of the SAP land uses are proposed as part of this project, and the traffic generation of those uses can be determined at this time, the cumulative traffic study does not include intersection analysis of full project buildout. This avoidance of a complete analysis of the proposed land use is not consistent with the intent or purpose of a program-level analysis, and is an improper deferral. The County is proposing to adopt a land use plan without analyzing the impacts of the whole of the project. Either these complete project and cumulative impacts must be examined, or the portions of the project which are "well beyond the planning horizon" (DEIR page 4-1) should be excluded from the project.

As previously stated, the City supports the concept of development within the Placer Ranch Specific Plan area, and in fact—as the County is aware—was once the lead agency for development in this area. Acting as Lead Agency, the City prepared a draft Specific Plan and published a Notice of Preparation (NOP), to which the County responded. The City's expressed concerns about the current DEIR analysis are consistent with those which were once strongly expressed in the County's letter (dated January 26, 2015; Attachment 2) on the City's NOP.

Based on these known areas of controversy, it is clear that the significant environmental effects of the project have not been adequately addressed in the DEIR. The cumulative analysis is insufficient, and the specific comments included in Attachment 1 of this letter, require that the County revise and recirculate the DEIR to address the City's concerns. Recognizing the regional benefit of the project, the City offers its full participation in the development of mutually-agreeable, adequate mitigation measures. These measures need to be supported by a fiscal analysis and development agreements preserving Roseville's current and projected public service levels, which would significantly reduce the project's impacts to the residents of Roseville and South Placer County. It is for these reasons that the City requests revision and recirculation of the DEIR. If you have any questions regarding the City's comments on the DEIR, please contact Senior Planner Lauren Hocker at (916) 774-5272 or via email at lhocker @roseville.ca.us .

Sincerely,

Kevin Payne
Assistant City Manager

Attachments:

Attachment 1 – Detailed City Comments on DEIR
Attachment 2 – Placer County Comments on the City's NOP
Attachment 3 – Pages from *City of Roseville Open Space Preserve Overarching Management Plan*
Attachment 4 – Riley Library Borrower Map

Cc:

Dominick Casey, City Manager, City of Roseville
Mike Isom, Development Services Director, City of Roseville
Greg Bitter, Planning Manager, City of Roseville
Lauren Hocker, Senior Planner, City of Roseville
Michelle Sheidenberger; Assistant City Attorney, City of Roseville
Ellen Garber, Esq., JD, Shute, Mihaly & Weinberger
Todd Leopold, County Executive Officer, Placer County
Steve Pedretti, Community Development Resource Agency Director, Placer County
Michele Kingsbury, Principal Management Analyst, Placer County
Crystal Jacobson, Principal Planner, Placer County

ATTACHMENT 1

The City of Roseville has the following comments on the DEIR, which consist of general comments, followed by more specific comments on chapters and sections of the DEIR, as indicated below.

General Comments

1. On Page 4-1, the DEIR states that it provides two levels of analysis: project-level for the PRSP, and program-level for the SAP and University. For the "program-level" analysis, this DEIR defers required analysis of known project details to a later date. While citing CEQA Guidelines Section 15168(a) to support this approach, the DEIR neglects to account for Section 15168(b), which states that the program EIR can "provide an occasion for a ***more exhaustive consideration of effects and alternatives*** than would be practical in an EIR on an individual action," and "***ensure consideration of cumulative impacts*** that might be slighted in a case-by-case analysis." [emphasis added] The purpose of a Program EIR is not to avoid detailed analysis, as this DEIR seems to imply. Rather, the purpose it to allow streamlining later analysis of subsequent actions by providing a comprehensive and connected analysis. However, this analysis has done the opposite. 4-14

   As an example, although modifications of the SAP land uses are proposed as part of this project, and the traffic generation of those uses can be determined, the cumulative traffic study does not include intersection analysis of the complete project buildout. This avoidance of a complete analysis of the proposed land use is not consistent with the intent or purpose of a program-level analysis, and is an improper deferral. The County is proposing to adopt a land use plan without having analyzed the impacts of the entire project. Either these complete impacts must be examined, or the portions of the project which are "well beyond the planning horizon" should be excluded from the project.

2. As a general rule of practice, legally adequate mitigation measures must:

   - Be quantifiable or sufficiently specific to demonstrate how the impact will be reduced;
   - Be fully enforceable through conditions or other binding agreements; and
   - Not defer formulation of measures until some future time, but may specify performance standards. 4-15

   In addition, the impacts of the mitigation measures themselves should be analyzed.

   Throughout the document, impacts to the City of Roseville are identified, but the mitigation measures simply state that the City of Roseville would be responsible for mitigation and the County will "coordinate with the City." As discussed below, specific mitigation measures for impacts to Roseville must be addressed and analyzed in the DEIR and not deferred.

Chapters 1- 3 (Introduction, Summary, Project Description)

3. Page 2-3, Required Permits and Approvals. Please add to the list an agreement with the City of Roseville delineating fair-share obligations for impacts to roadways within Roseville 4-16

4. Page 2-64, Impact 4.9-1, Mitigation Measure 4.9-1b. Development in Placer Ranch needs to fund additional design costs for any additional retention or detention storage needed to accommodate project stormwater runoff, as well as share in any associated costs including purchase, design, and 4-17

technical studies (including environmental review) for such storage. In addition, funding for future maintenance and operations is required. A City/County funding agreement is required prior to any development approvals being granted that would rely on this facility for mitigating stormwater impacts. **4-17 cont.**

5. Page 2-73, Mitigation Measure 4.11-5a. Is rubberized concrete intended to refer to rubberized asphalt concrete (RAC)? In order to provide permanent sound reduction, a surface paved with RAC must be properly maintained (regardless of material, road noise increases as a road wears) and must be resurfaced with RAC, which is not a traditional paving material. The mitigation measure does not establish a process or program to ensure that regular maintenance and resurfacing with RAC occurs. Also, RAC should not be used on designated Truck Routes, because research has shown that it is much less effective at reducing noise from heavy vehicles (Report on the Status of Rubberized Asphalt Traffic Noise Reduction in Sacramento County, Bollard and Brennan, Inc, November 1999). **4-18**

6. Page 2-79, Mitigation Measure 4.13-8. How will the increased maintenance cost to the City be mitigated? It is anticipated that additional maintenance will be incurred due to the large increase in traffic from Placer Ranch. **4-19**

7. Page 2-80, Mitigation Measure 4.14-1a. The widening of Sunset Boulevard needs to occur before the first building occupancy. **4-20**

8. Page 2-80, Mitigation Measure 4.14-1b. The extension and widening of Foothills Boulevard from the City of Roseville to the project boundary needs to occur concurrent with the initial specific plan infrastructure construction. This is important to ensure that traffic impacts on City roadways are minimized to the extent practicable. **4-21**

9. Page 2-82, Mitigation Measure 4.14-3. The impact fees associated with mitigation for impacts within the City of Roseville should include the cost of timing new signals and retiming existing signals to accommodate the increase in traffic. **4-22**

10. Page 2-91, Mitigation Measure 4.14-10. Fair share contributions to regional roadways should include Placer Parkway. **4-23**

11. Page 3-4, Exhibit 3-3 *Project Area Map*. Please note that the Local Agency Formation Commission (LAFCO) approved the Amoruso Ranch Specific Plan for annexation into the City of Roseville in December 2018. Please update the City of Roseville boundaries accordingly. **4-24**

12. Page 3-7. The Project Objectives for the PRSP indicate that an objective is to integrate plans for Placer Parkway, including establishing a corridor, and that the impacts of the facility were covered in a previously approved EIR. It should be noted that the previous program level EIR/EIS and project approval only established where the corridor would be located, but it did not include specifics such as information on facility performance standards, right-of-way needs, dedication of land, cross-sections, buffers, or interchange designs. While some of this information is contained within the PRSP and SAP, this information should at least be referenced within the DEIR. Otherwise, it appears that the project has not been designed to accommodate the facility, and it is unclear whether the physical impacts of facility construction have been analyzed. The Specific Plan also does not include a requirement that developers dedicate right-of-way, despite this language being included for other facilities. Please see the City of Roseville's Amoruso Ranch Specific Plan and EIR (SCH# 2013102057) for an example of the level of detail which should be included in the analysis. **4-25**

13. Page 3-16. Housing in the Commercial and Industrial zones. The project includes a General Plan Amendment, which will allow up to 30 residential units per acre within the Entertainment Mixed-Use, Innovation Center, and Light Industrial land uses. However, while up to 30 units per acre would be permitted, Table 3-3 of Project 20-Year Development does not list any housing units within these land uses. Because residential development of 30 units per acre would be consistent with the proposed General Plan Amendment, the table should be amended to disclose the assumptions used in the DEIR analysis, particularly the traffic study, for the amount of residential development that could be built within these commercial areas as part of the project description. **4-26**

14. Page 3-23, Exhibit 3-7, Circulation Diagram. The sections of Foothills Boulevard and Industrial Avenue within the City of Roseville should be widened to match the required lane geometry required just to the north of the City. This should be figured into the project cost and/or accounted for in the mitigation fee. **4-27**

15. Page 3-26, Public Transit. Please provide more details regarding the Bus Rapid Transit requirements, including additional travel lanes, queue jump lanes, and transit stations. The need for additional right-of-way dedication should be defined. **4-28**

16. On page 3-55 in the discussion of recycled water, the 1st Paragraph, 2nd Sentence states: "…Recycled water would be provided to the PRSP area using existing infrastructure from the City of Roseville Dry Creek and Pleasant Grove Wastewater Treatment Plants…". The City will need to determine (based on capacity) which plant or plants will deliver the recycled water. Therefore, it is premature to determine whether the Dry Creek and Pleasant Grove waste water treatment plant would be selected. **4-29**

17. On page 3-55 Wastewater Treatment, Paragraph 1, the final sentence states that the PRSP will generate average dry weather flows of 1.99 MGD. Under the utilities section of the DEIR and in the master sewer plan, it is determined that the Project will generate 2.17 MGD. Please modify the sentence on page 3-55 to refer to 2.17 MGD. **4-30**

18. Page 3-58, PRSP Drainage System. The fees collected by the County for the Pleasant Grove Retention Basin should consider all previous and future costs for property acquisition, environmental, design, construction, operation, and maintenance. Refer to prior comment 4. **4-31**

19. Page 3-64 Foothills Boulevard (north). This section does not mention the facility improvements which would be needed within the City of Roseville to complete the extension of Foothills Boulevard. While Page 4-5 incorporates by reference the City's Foothills Business Park Annexation EIR for the extension of Foothills Boulevard, the scope of the extension project has changed in terms of both the number of lanes and the proposed alignment, so the analysis cannot entirely rely on this prior EIR and the DEIR analysis must be supplemented. **4-32**

20. Page 3-69, Pleasant Grove Retention Facility, last paragraph. The fee program referenced in this section must ensure that a mechanism is in place to fund all associated costs for property acquisition, environmental review, design, construction, operation, and maintenance. **4-33**

21. Page 3-79, Section 3.8. Foothills Boulevard is described as a four-lane arterial in this section. In other places in the DEIR, it is described as a six-lane facility. Please revise the DEIR to be consistent. This section should also include offsite mitigation improvements or appropriate fees for the widening of Blue Oaks Boulevard between Washington Boulevard and Foothills Boulevard, and the extension of a four lane Roseville Parkway between Washington Boulevard and Foothills Boulevard. **4-34**

4.1 Aesthetics

22. The update to the Sunset Area Plan will substantially increase development potential over the existing Sunset Industrial Plan. This update would allow buildings up to 150 feet in height in the Innovation Center and 225 feet in height in the Commercial Recreation, Hotel, and Hotel Resort land uses. The City of Roseville shares three miles of common border with this development area, but despite this fact, the visual analysis in the DEIR only includes a single vantage point in Roseville, which is taken from Fiddyment Road at one limited angle of view. No photosimulations are provided, which makes it difficult to understand the scope of the impacts. The quality of a view, and the impact thereon, depends on the viewing location and the viewer group observing the view. However, the DEIR has included only a handful of viewing locations, which are not representative of actual viewpoints observed by the public in those locations; has provided photos which are of limited scope/direction and do not represent the actual view of people standing at the viewpoint; and have been taken from locations which ensure that there are intruding visual encroachments in the foreground, thereby distorting the actual view that would be experienced. These comments will focus on the viewpoint in the City of Roseville, to explain the concerns. 4-35

    For example, Viewpoint 6 is taken from the end of Fiddyment Road, and is intended to represent the existing viewshed for City of Roseville residents. Rather than taking the photo from the end of the road or sidewalk, the photo has been taken from a position farther back, which ensures there are barricades, a light standard, and other encroachments within the foreground. The analysis states that the vividness, unity, and intactness of the view are low, though it provides very little explanation of this conclusion. The City would agree that the vividness of the view is low, but the conclusions regarding unity and intactness are based entirely on the assumption that the viewshed includes a foreground consisting of incompatible urban residential elements. Many citizens of the City of Roseville who live and travel on the southern boundary of the Project site have significant views of the Sierra Nevada mountain range. Future development will likely block these views. Therefore, the City disagrees that aesthetic impacts would be less than significant, for the reasons stated above.

4.3 Air Quality

23. Page 4.3-9, Exhibit 4.3-1 shows that even at a distance of one mile, there are already many odor complaints due to the landfill. Therefore, the DEIR needs to more fully discuss the impacts of reducing the land use buffer surrounding the landfill, which will exacerbate odor impacts. 4-36

24. Page 4.3-11 Future WRWMA Operations. This section discusses the future program, but doesn't carry the analysis through the document. The landfill expansion plans are a reasonably foreseeable project and, due to the County's proposal to amend its General Plan to reduce the land use buffer between future residential development and the landfill, would increase odor impacts and land use incompatibility related to odor (see comments on Section 4.10, below). The DEIR should analyze and disclose these reasonably foreseeable significant impacts. 4-37

25. Page 4.3-51 concludes that because odor impacts are subjective, mitigation is infeasible, but this is not accurate. Please refer to the City's comments on the land use compatibility analysis; the project should include payment of fair share fees, which is feasible mitigation. 4-38

4.4 Biological Resources

26. The DEIR does not mention potential impacts to City of Roseville wetland preserve areas adjacent to the project, and should be corrected to reflect the following: 4-39

a. Show the adjacent City preserve areas graphically, specifically labeling the location of preserved wetlands.

b. The open space preserves are owned by the City, and the City could be liable to federal and State permitting agencies if any impacts occurred to protected wetlands on its property. Therefore, the County's mitigation measure should include a requirement to submit improvement plans to the City's Open Space Manager for review and comment prior to construction.

c. Onsite conservation plans should include a management approach for the locations where PRSP Area open space is contiguous with City of Roseville preserve areas. The City of Roseville recommends management consistent with the *City of Roseville Open Space Preserve Overarching Management Plan.* 4-39 cont.

d. The Project's Design Standards currently show that open fencing will be provided adjacent to the City's open space preserve. Development adjacent to the City of Roseville preserve areas should use masonry walls, or fencing otherwise designed to prevent impacts to the biological resources (e.g., unauthorized drainage, gates for accessing the open space for recreational use, dumping of yard waste, landscaping, etc.)

e. Project design must ensure that outfalls do not drain into City of Roseville preserve areas; therefore, the County's mitigation measure should specify this design requirement.

27. The potential for disturbance of biological resources in the adjacent City of Roseville preserve areas is high, and could be mitigated with measures including (but not necessarily limited to) the measures identified in Section 5.2 of the *City of Roseville Open Space Preserve Overarching Management Plan* (dated August 5, 2011), as included in Attachment 3, substituting the County as the overseeing agency. 4-40

4.9 Hydrology and Water Quality

28. The Hydrology and Water Quality chapter uses the term "future development" when describing all planned development in the SAP and PRSP. The City finds this terminology to be acceptable as long as the County agrees that the term "future development" is equivalent to "all SAP and PRSP development," all of which is reasonably foreseeable, such that no exclusions would occur. 4-41

29. Flooding of existing County properties, including the Gleason's and Amoruso Estates, are known areas of controversy, even during the two-year event. The DEIR does not address this issue. The DEIR should indicate whether the Project will create any increase in offsite flows that would impact these areas. This is of concern to the City, because flows from PRSP and SAP will be conveyed through the Amoruso and Creekview Specific Plan areas. Until the Amoruso and Creekview improvements are implemented, there may be additional impacts that are not currently identified in the DEIR. This should be addressed in the DEIR. 4-42

30. Page 4.9-28 indicates that implementation of the PRSP would require construction of the planned Pleasant Grove Retention Facility in the City of Roseville. However, Mitigation Measure 4.9-1b is not sufficient. The DEIR states that the City has already designed and approved, but has not yet constructed, the facility. It should be noted that the flows from this Project were not contemplated at the time the program-level City of Roseville Retention Basin Project (aka Pleasant Grove Retention Facility) EIR was certified (State Clearinghouse Number 2002072084). Additional environmental review will be required to construct the facility, particularly since DEIR Appendix C (Storm Drainage Report) indicates that the project will require expansion of this planned facility. 4-43

Mitigation Measure 4.9-1b discusses payment of fair-share fees to the County, but not to the City, and does not specifically reference the Pleasant Grove Retention Facility. Mitigation Measure4.9-1b also does not acknowledge the fact that the project will result in a need for expansion of the planned facility, which should be reflected in the fair-share fee developed for the project. Please add the following language to make it clear that a fair-share development fee will be required and is a fully enforceable mitigation measure:

"The applicants for individual projects shall annex into the City of Roseville Regional Retention Basin fee district and pay the Pleasant Grove Drainage fee, which will be calculated to address the cost to accommodate the contribution of the Placer Ranch/Sunset Area project, to the City prior to the approval of each building permit. The fee shall be calculated to cover the fair share cost of retention and maintenance for that development's portion of the Pleasant Grove Retention Basin Project at the Al Johnson Wildlife Area.

Development proposals in the PRSP and SAP shall demonstrate, through the preparation of technical engineering studies, that the increased volume of stormwater runoff from the proposed development can be accommodated in the approved City of Roseville Regional Stormwater Retention Facility. The results of the study shall be submitted to the City of Roseville Public Works department for review and concurrence. If expansion of the retention basin is required, the County shall work with the City to expand the retention facility as necessary, following appropriate environmental review, and funded through fair share contributions by SAP project developers at the building permit stage."

4-44

31. Page 4.9-28. Lakeview Farms Retention Basin. The City suggests updating the statement "currently planned for construction in 2018," date unless construction did start in 2018.

4-45

32. Page 4.9-31, *Mitigation Measure 4.9-1a: Submit final drainage report (Net SAP Area and PRSP Areas)* City recommends adding this statement at end of the paragraph "The final drainage report shall...address comments submitted during the public review period."

4-46

33. Page 4.9-43. The City is concerned that the DEIR does not define and map the 100-year floodplain areas for the entire project area, instead deferring that information and analysis of impacts within the 100-year flood zone (Impact 4.9-5) to future, individual projects as part of improvement plan submittal. As a direct result of this deferral, the analysis concludes that the impact is potentially significant, because the ability to avoid floodplain impacts cannot be known with certainty (DEIR page 4.9-43: "However, at this stage of planning, the details of these measures have not been developed, and the County conservatively determines this impact to be potentially significant." The City of Roseville is downstream in the Pleasant Grove Watershed, so any impacts due to increased development in the 100-year flood zone within the project area have the potential to cause downstream impacts in the City. The DEIR should be revised to disclose the location of the existing 100-year floodplain within the project area as a necessary prerequisite to considering the impacts of full buildout of the project.

    As a result of the above concerns, the City also has questions and recommended changes to the proposed Specific Plan policies, which may help reduce or avoid this impact. Greater explanation should be provided for Policy PFS-5.6, which is unclear on the methodology that must be used to mitigate impacts (the policy states "unless another methodology has been agreed upon by Placer County.") Policy NR-3.2 also should be revised to add a definition for "calculated 100-year-floodplain," which should include a 100-year future, fully-developed floodplain.

4-47

34. Appendix D – Volumetric Retention Studies: ensure that the updated work that the County, City of Roseville, and consultants have produced up until October 2018 is incorporated into Appendix D and the DEIR.

4-48

4.10 Land Use

35. Page 4.10-14, Impact 4.10-2 discusses impacts related to consistency and compatibility with the Western Regional Sanitary Landfill (landfill), and concludes the impacts are potentially significant. The project includes an amendment to Placer County General Plan's Solid Waste Public Facilities Buffer Standards to reduce the residential buffer zone of the landfill from one mile to 2,000 feet (or 1,000 feet on a case-by-case basis). Existing Placer County General Plan Policy 4.G.11 further states: "When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the dominant land use in the area." The DEIR analysis acknowledges that the purpose of the existing buffer is to protect the landfill from pressures to implement odor control or reduction measures due to land use incompatibility. The analysis also acknowledges that a one-mile buffer is recommend by the Placer County Air Pollution Control District, though it does not mention that the same recommendation is contained within the California Air Resources Board "Air Quality and Land Use Handbook." Despite acknowledging these factors, and concluding on DEIR page 4.10-17 that the project would increase odor complaints and lead to pressure on the facility to implement additional odor control measures, the analysis concludes that because Placer County does not control the landfill, mitigation is infeasible. This conclusion is incorrect. Payment of fair share fees is a feasible mitigation measure which would allow the landfill to make needed modifications, and should have been examined in the DEIR. **4-49**

    In addition, the project analysis of landfill impacts is artificially limited to an analysis based on the existing condition. However, planning for landfill expansion is underway. Conceptual layouts for the facility expansion have been available since 2016, stakeholder outreach and planning have been ongoing since that time, and the Notice of Preparation for the expansion project is in development and expected to be released shortly (per the Western Placer Waste Management Authority February 14, 2019 Board of Directors agenda). The expansion is a reasonably foreseeable project, and conceptual layouts for the expansion have long been available, but the DEIR analysis does not examine the impacts of the project due to the expansion. Please revise the DEIR to include this cumulative analysis.

4.11 Noise

36. Page 4.11-34 Roseville Power Plant 2 – This section states that "The draft PRSP indicates a masonry wall would be located around the existing RPP2 site but does not provide specific performance criteria to ensure that adequate sound attenuation would be achieved." The DEIR should be modified to reflect the following:

    a. The specific plan developers shall be responsible for the construction of the wall, at their cost.

    b. The wall must meet City of Roseville Design and Construction Standards for sound barrier design, and should be submitted to the City for review, to ensure the City's facility is adequately protected from land use conflicts created by the Project. **4-50**

    c. Mitigation Measure 4.11-4B should be revised to specify that either the wall, or a combination of a wall and setbacks, must result in the achievement of Placer County noise standards. Currently, the measure says only that a 5 dB reduction in sound is required, which is insufficient to offset this impact.

4.13 Public Services

37. Page 4.13-24, Impact 4.13-1. The City of Roseville Fire Department is currently providing a disproportionate level of service due to calls for service in Placer County in order to backfill **4-51**

services in the Sunset Area. This project has the potential to substantially increase the need to provide mutual aid. This is not currently addressed in the DEIR. Although Mitigation Measure 4.13-1b states that two fire stations must be constructed in order to offset impacts of the project, the measure does not identify the locations, provide triggers for the timing of construction, or include any performance standards for determining the effectiveness of this mitigation measure, instead deferring that to a future decision-making process. The City has previously made this comment, and in response the DEIR has included a statement that fire stations are a permitted use on commercially zoned properties; this is not sufficient. Rather, the DEIR must disclose the size of the stations, where they will be located, the timing for construction, and how they will be funded, which are essential to the understanding of the impacts to the City of Roseville Fire services and whether they are being mitigated.

4-51 cont.

38. Page 4.13-27, Impact 4.13-2. The DEIR does not adequately address the law enforcement impacts and increased demands which would affect the Roseville Police Department. The plan area would directly adjoin the City of Roseville and would create the physical and visual impression that it receives law enforcement services from the City of Roseville. DEIR Page 4.13-1 specifically identifies that the City of Roseville expressed concern about impacts to City law enforcement services, but does not discuss City police services. The City has the following concerns:

    a. Communications Center impacts. Citizens seeking law enforcement services increasingly rely on cellular phones for their primary telephone services and do not have landline phones. Cellular 9-1-1 calls under the current technology are routed to the nearest "public safety answering point" (PSAP) via an imprecise system based on cellular phone tower location and antenna orientation. This project will result in daily increased calls for service to the Roseville Police Department, which is the PSAP for Roseville and handles all 9-1-1 calls, police dispatching, fire dispatching, and EMS dispatching for the City of Roseville. This increased demand would adversely affect the capabilities of the RPD because dispatcher workload would increase. Dispatchers would have to answer every additional call, triage the need for services, and then route to the proper agency, which is likely to result in reduced response times. The DEIR includes no discussion of this critical public safety impact.

    b. Traffic impacts. The California Highway Patrol Auburn Office provides coverage to hundreds of miles of state and county roadways and is lightly staffed. The Roseville Police Department is regularly tasked to respond and assist at major collision scenes near our city because of their staffing shortage. The proposed plan will greatly increase traffic volumes, on Fiddyment Road and Blue Oaks Boulevard, as indicated by the traffic impact study in the DEIR, which will result in increases in accident rates. This will result in increased demands upon the Roseville PD and Roseville FD to respond to collisions within the City. The DEIR states that because the project is not adding to the freeway system, no impacts to CHP services will occur, which is not accurate. Without additional CHP staffing the Roseville PD will receive increased requests for allied agency assistance from the CHP to this area.

    4-52

    c. Page 4.13-27, on staffing for police services. Policy 4.H.1 of the County General Plan states: "within the County's overall budgetary constraints, the County shall strive to maintain the following staffing ratios (expressed as the ratio of officers to population): a. 1:1,000 for unincorporated areas." The DEIR does not adequately explain how the County will maintain this staffing ratio for the planned development, and whether additional stations or other physical facilities will be required. The DEIR indicates that 19 additional officers will be needed for the project. Nineteen officers will not meet the residential growth (24K population/roughly 8,000 units). An urban standard of one officer per thousand population would require a minimum of 24 Officers. There is also no analysis of the impacts due to a reasonably foreseeable student population of 30,000 at the proposed

university, even though some proportion of this population will live off-campus within the project area or surrounding cities such as Roseville. Additionally, there is no discussion regarding timing of officers, how police response will be handled during initial phases, or mutual aide.

d. Response Times. The proposal would result in law enforcement staffing which is below the standards set forth in the County's General Plan. On page 4.13-4 of the DEIR, it is stated that the average call response rate is 15 minutes for Priority 1 calls. According to Policy 4.H.2 of the County General Plan: "The County Sheriff shall strive to maintain the following average response times for emergency calls for service: 6 minutes in urban areas." The DEIR does not include an analysis of how this development will affect response times. 4-52 cont.

39. Page 4.13-33, Impact 4.13-4. The project impacts to the City's Martha Riley Community Library (Riley Library) is a concern. The Riley Library is only 3.5 miles away from the project area. City of Roseville Parks, Recreation, and Libraries staff mapped the home addresses of all library cardholders who use the Riley Library (see Attachment 4), and found that a significant number of users are within close proximity to the County's Rocklin library and, nevertheless, still utilize Riley Library. This indicates that use of the Riley Library would increase even more due to the proximity of the project plan area to the Riley Library. This impact is acknowledged by the DEIR, but neither the SAP nor the PRSP include a public library to meet demands, and no fair-share fees to the City are included in mitigation. The DEIR instead speculates that it is possible the proposed university will provide a library which meets community-wide needs and is publicly accessible. The conclusion further states that unmet library demands within the project will be supported by a planned regional library within Placer Vineyards (DEIR page 4.13-34), even though the library is not currently planned for construction and would be a minimum of two miles farther away for residents than the City's Riley Library. With no commitment from the future university and no funding to build a new library within the project area, the City is concerned about the increased demand that will be placed upon the City's library, which could require expansion. This is an unmitigated and unfunded impact to the City library system which must be addressed in the DEIR. 4-53

40. Page 4.13-35, Impact 4.13-5. The City has a number of concerns related to the DEIR analysis of park impacts, as follows:

    a. The DEIR includes privately-owned park acreage in its determination that required parkland dedications are met. This is inappropriate, because this private parkland is not accessible to the public. At a minimum, the DEIR must demonstrate that the parkland dedication requirement will be met both for private and public subdivisions, to ensure that private parkland isn't being used to meet demand generated by populations who will not have access to these private recreational facilities. Counting private recreation facilities towards parkland requirements increases unmet park needs and increases the likelihood that residents of the project will increase use of and substantially degrade City facilities.

    b. While the SAP area includes fewer residential units than the PRSP area, it will nonetheless generate a population that will have a demand for parkland. The DEIR does not include these units in its calculations of parkland, which further increases the unmet needs that City facilities will fill and impacts on City park and recreational facilities. See prior comment, above. 4-54

    c. Thank you for looking at expanding one of the plan area's park sites. It certainly helps in addressing the recreation needs of the new community. According to the County standards, 4 hardball diamonds, 4 little league diamonds and 6.6 soccer fields are needed based on the projected population. Only 2.5 little league fields and 4.5 soccer fields are planned,

however, leaving the unmet needs to be addressed by the City of Roseville. With no commitment from the future university to provide additional public park and recreation facilities, this impact on City park and recreation facilities due to increased use and facility wear and tear, leading to substantial deterioration of the facilities, will remain a significant unmitigated impact. See Comments 2 and 3, above.

d. The DEIR discloses Roseville parks that are likely to be impacted by the project, but excludes key facilities from the list. The DEIR should be revised to discuss Stizzo Park, Harrigan Greens, Bos Park, Sierra Crossing Park and Astill Family Park. In addition, page 4.13.38 references Maidu Regional Park, but the closest regional park is Mahany Park, which is not listed or shown in the DEIR.

4-54 cont.

41. Page 4.13-44, Impact 4.13-13: Cumulative impacts due to additional demands on existing park and recreation facilities within the City of Roseville are potentially significant. The City has implemented in-lieu fees as a mechanism to address city-wide or regional parks within our boundaries. This does not include or address impacts or increased demands from beyond city limits, however, as described in the comments above. Therefore, this is an unmitigated and unfunded impact to the City's park system which must be addressed in the DEIR.

4-55

4.14 Transportation and Circulation

42. The City previously requested that the County address the extension of Foothills Boulevard. The DEIR continues to lack a description and analysis of the Foothills Boulevard Extension even though it is a necessary improvement for buildout of the project. This critical roadway needs to be identified as a project responsibility and evaluated at a project level to ensure that the improvements are feasible. The DEIR must include an analysis of the entire off-site portion of the proposed Foothills Blvd. Failure to include a project-level analysis at this time jeopardizes the ability of the County to obtain of funding and right-of-way dedications. Page 4.14-51, Foothills Blvd Extension: The DEIR specifies that 50% of the PRSP could be developed before this connection is needed, and that 75% of PRSP would need to be built before the necessary funding is available. The City takes strong exception to this assessment of need. The City's concerns with project scenario modeling assumptions, also stated elsewhere in this comment letter, indicate that the impacts to Fiddyment Road and Woodcreek Oaks Boulevard are substantially underestimated, and therefore the Foothills Boulevard extension may be essential to mitigating impacts to Roseville roadways. As a result, the DEIR analysis of the when this required facility will be necessary is significantly misstated as well. Additionally, the City takes issue with the fact that the DEIR does disclose the timing and funding of the roadway connection and bridge construction costs.

4-56

43. The analysis of the cumulative scenarios assume the completion of major roadways outside the boundaries of the project. The construction of these regional improvements will provide alternative routes of travel that will effectively minimize impacts to the City. Many of these projects rely on funding programs that have yet to collect the needed money to compete the projects. Therefore, to insulate the City from development impacts, without the assumed project in place, a Phasing plan should be developed that identifies threshold of absorption that could occur prior to the completion of corresponding improvements of certain roads that aid in minimizing impacts to existing streets.

4-57

44. The traffic modeling assumptions used in the scenarios analyzed in the DEIR include roadways connecting Fiddyment Road to Blue Oaks Boulevard, and Woodcreek Oaks Boulevard to Blue Oaks Boulevard through residential neighborhoods via Crocker Ranch Road and Parkside Way. While Crocker Ranch Road is a residential collector, this roadway has not been included in any previous traffic impact model analysis. Parkside way is a local residential roadway with residential frontages and is not appropriate to include in the model as a major linkage. A traffic impact analysis should

4-58

not rely on or include minor residential roadways such as these, because it creates alternate cut-through routes that are inappropriate, and artificially lowers modeled volumes on major arterials. Inclusion of these minor residential roadways in the model leads to an under-representation of the impacts on Fiddyment Road and Woodcreek Oaks Boulevard, as well as the impacts and timing expectations for the Foothills Boulevard extension as a required offsite improvement of the Project. The "Existing plus Project" model indicates 20,000 ADT on Parkside Way, a local residential roadway, and up to 24.9K ADT on Crocker Ranch, a two lane residential collector. These links should be removed from the model in order to accurately estimate the impacts to Fiddyment Rd Woodcreek Oaks Blvd and other roadways and intersections in the Study Area. 4-58 cont.

45. Pages 4.14-94 through -96. The Cumulative "No Project" traffic modeling and the various "Cumulative Plus…" scenarios include assumptions that are not reasonably foreseeable. The City does not agree with the following assumptions:

    a. Full buildout of SR65/I-80 interchange improvements. ***Comment:*** *While the SACOG MTP/SCS includes completion of this facility, funding sources are speculative and unsecured at this time. It is unlikely that full buildout of the interchange improvements will be funded and completed before significant traffic impacts develop as a result of the Project. Phase 1 and Phase 2 of the interchange project are reasonably foreseeable, based on funding sources. The model should be revised to reflect completion of Phase 1 and Phase 2 of the interchange only, in order to accurately calculate estimated impacts to other roadways and intersections in the study area.*

    b. Completion of Placer Parkway to Santucci Blvd/Watt Ave. ***Comment:*** *The City does not agree with the statement that construction of this segment is "predicated on development in the PRSP area." Placer Parkway is an independent facility approved by the Placer County Transportation Planning Agency (PCTPA) in 2009 to meet regional transportation needs; it is not part of or solely dependent upon the SAP/PRSP project. The project and DEIR do not include a commitment by the County to build this facility with the project, nor does it include the necessary project-level environmental review required to build the facility. Completion of this segment of Placer Parkway is subject to funding provided through the SPRTA Tier II fee program which relies on development impact fees collected through full buildout of several other large development projects—projects which the transportation analysis does not include in the Project study area, such as buildout of Placer Vineyards and other areas subject to the SPRTA Tier II fee program identified in the Tier II Development Fee MOU dated December 9, 2008.* 4-59

    Completion of Phase I of Placer Parkway can be reasonably assumed at this time due to the ongoing collaborative efforts between Placer County and the United Auburn Indian Community, in coordination with PCTPA, to advance funding for Placer Parkway Phase I. However, the Phase 2 segment cannot be assumed without including full buildout of the fee areas included in the SPRTA Tier II MOU. Therefore, completion of Placer Parkway Phase 2 is not reasonably foreseeable and should be removed from the model in order to accurately determine project impacts on the other roadways and intersections in the study area. If Placer Parkway Phase 2 is to be included as a reasonably foreseeable improvement, then the traffic analysis must be modified to assume full buildout of the SPRTA Tier II fee program areas as identified in the SPRTA Tier II MOU.

    The result of these issues is a DEIR that misrepresents and understates cumulative transportation impacts. Having determined that Placer Parkway is dependent upon the project, the DEIR includes a Cumulative No Project scenario which excludes Placer Parkway and a Cumulative Plus Project scenario which includes the facility. Placer Parkway is a regional facility that causes significant changes to traffic distribution, which skews the

analysis and significantly underreports the impacts of the project on Roseville's traffic network.

c. Riego Road is widened to four lanes from SR 99 to Placer County line. ***Comment:*** *These improvements are unfunded and are not currently identified in an established fee program. Further, these improvements are not included in the SACOG MTP/SCS. This segment improvement should be removed from the model in order to accurately determine project impacts on Riego/Baseline Road and other roadways and intersections in the study area.* **4-59 cont.**

46. Blue Oaks Boulevard is extended west of Roseville city limits to Santucci Boulevard. ***Comment:*** *This segment is unfunded and not currently identified in an established fee program. This segment improvement should be removed from the model in order to accurately determine project impacts on Blue Oaks Blvd and other roadways and intersections in the study area.*

47. Page 4.14-39. The proposed LOS E within the project (Policy TM-1.2: Level of Service) is significantly lower than the adjacent County LOS C and City of Roseville LOS C. This will result in an inconsistency in the width and number of lanes on the two major roadways connecting PRSP to the Amoruso Ranch Specific Plan (ARSP). The ARSP model identified the need for 4-lane minor arterial roadways while the PRSP model indicates the need for 2-lane collectors. Increasing the PRSP roadways to 4 lanes would allow more south-westerly traffic volumes to utilize the 4-lane connections to 6-lane Westbrook Boulevard, which would alleviate project impacts to Fiddyment Road and Woodcreek Oaks Blvd. **4-60**

48. Page 4.14-13, Table 4.14-8. Unsignalized intersection Operations – Existing Conditions. Junction/Park Regency will be signalized during summer 2019 by the City. Woodcreek Oaks/Crimson Ridge & Woodcreek Oaks/Painted Desert were signalized in 2018. Woodcreek Oaks/Northpark & Woodcreek Oaks/Parkside would need to be signalized at the time Woodcreek Oaks is "punched through" due to ongoing political and safety concerns. With all of these existing conditions changed, how does that change the model? The traffic analysis should be updated to reflect these factors, particularly with respect to the analysis of the proportion of intersections operating at LOS C or better. (These same comments apply to pages 4.14 69-71) **4-61**

49. Page 4.14-27, Policy 3.A.7 – Dry Creek/West Placer Community Plan – *Arterial roadway Baseline – Sutter County Line to Walerga Rd/Fiddyment Rd: LOS E & Intersections Baseline Rd/Watt: LOS F and Baseline Rd./Fiddyment: LOS F.* Potential impacts to the above facilities, for the portions which are within the City of Roseville, should be analyzed in the DEIR based on City of Roseville level of service policy/standards. **4-62**

50. Page 4.14-29. The DEIR includes the City of Roseville General Plan Policy establishing an LOS C threshold for all signalized intersections and roadway segments, but needs to be corrected as shown below in **bold, underlined** text.

    Maintain a level of service (LOS) "C" standard at a minimum of 70 percent of all signalized intersections and roadway segments in the City during the **a.m. and** p.m. peak hours. Exceptions to the LOS "C" standard may be considered for intersections where the City finds that the required improvements are unacceptable based on established criteria identified in the implementation measures. In addition, Pedestrian Districts may be exempted from the LOS standard. **4-63**

51. Page 4.14-29. The City's LOS policy applies to both roadway segments and intersections. Instead of expressing roadway segment LOS policy in terms of volumes, the City relies on its intersection LOS criteria to determine roadway width needs; that is, the number of through lanes needed for an intersection to operate at an acceptable LOS C is equivalent to the number of lanes needed on the **4-64**

roadway segment leading up to the intersection. Despite this adopted policy for roadway segments, no roadway segment impacts have been analyzed or identified in the DEIR for the City of Roseville. **4-64 cont.**

52. Page 4.14-35. Proposed Road Access. Woodcreek Oaks Boulevard southerly into the City of Roseville –DEIR Impact 4.14-4 states that signal warrants will be met for this facility until the Foothills Boulevard extension is completed, at which point volumes would reduce to levels below signal warrants. Given that the DEIR specifies 75% of PRSP would need to be built before the necessary funding for Foothills Boulevard is available, mitigation should specify that a signal must be installed at Woodcreek Oaks/Parkside and Woodcreek Oaks/Northparkat the project's and/or County's expense. In addition to meeting signal warrants, this improvement will be vital because these intersections serve a park and school, and the signals will be needed to avoid safety impacts. Currently the City has been able to mitigate these safety impacts with an all-way STOP and pedestrian improvements, but these measures will no longer be effective due to the planned increase in traffic due to the project. The analysis should be updated to disclose this impact and identify effective mitigation. **4-65**

53. Page 4.14-39. Proposed Sunset Area Plan Goals and Policy. Building off of policy TM-1.11: *Autonomous Vehicle Technology* there is no mention of any other Intelligent Transportation Technology/Systems (ITS) in this section or any other mention of it within the Transportation section. ITS technology needs to be incorporated into all areas of the transportation plan to take advantage of innovative technology that will help provide the safe and efficient movement of traffic within and between the jurisdictions. **4-66**

54. Page 4.14-42, Policy TM-5.1 – Truck Routes – The County needs to work with adjoining/local agencies when updating its commercial (STAA) routes to ensure that adequate routes are provided to and from the local freeway system. A mitigation measure or policy language should be added to the DEIR and Specific Plan to reflect this. **4-67**

55. Page 4.14-45, Exhibit 4.14-9. The change in ADT existing and existing plus Project Buildout shows only 40+ new trips generated on Fiddyment north of Pleasant Grove and Blue Oaks, which seems like an obvious underestimate of traffic on this four-lane roadway. Page 4.14-49 states that it would operate at LOS D, E, or F, which is extremely unclear. **4-68**

56. Page 4.14-50. Phase 1 of Placer Parkway – This section states that several roadways and intersections in Roseville will experience degraded traffic operations, and that the County is currently in the final design stage for Phase 1 of Placer Parkway and is trying to secure funding for those improvements. The DEIR states that if funding is secured, construction is anticipated to be completed by 2022, which will help mitigate the traffic impacts. The DEIR further states that approximately 25% of the PRSP could be developed prior to the opening of Phase 1 of Placer Parkway, and that these impacts are considered significant and unavoidable. Given that funding is unsecured and construction documents have not been started, the estimate of a 2022 completion date for Placer Parkway Phase I is unrealistic. Since this facility is being relied upon to offset impacts, mitigation should be included which includes a development trigger for the facility. That is, mitigation must specify the amount of dwelling units representative of 25% buildout, and require that the facility be installed before any further residential building permits are issued. **4-69**

57. Page 4.14-51. Significance after Mitigation – The DEIR explicitly states there is a timing gap between when significant impacts to Roseville facilities will occur and when funds for mitigation will become available. Specifically, it is stated that impacts will begin at approximately 50% of planned PRSP development, but funds for improvements wouldn't be available for any mitigation projects until 75% of the development in the PRSP area occurs. This is considered a significant and unavoidable impact when relying on the TIF program for mitigation, but the analysis does not **4-70**

explore or describe whether there is other feasible mitigation which could reduce the impact at the time it occurs. 4-70 cont.

58. Page 4.14-54. SAP Area – PFE/Watt – will experience an increase in delay from 85 seconds to 492 seconds, which is more than 8 minutes. The DEIR states that the facility will meet signal warrants, but there is no discussion of whether the installation of a traffic signal in this location is within the Sacramento County CIP or planning documents. 4-71

59. Page 4.14-59, Impact 4.14-3: The City's General Plan Circulation Element, page III-33, includes Level of Service Policy 1, which requires an LOS standard of "C" at a minimum of 70% of all signalized intersections and roadway segments. According to the DEIR, the project will cause PM peak hour operations in Roseville to drop from 84% to 68% of intersections operating at Level of Service C (LOS C). As a result, the proposed project will have a significant traffic impact because it will cause the City's traffic network to be inconsistent with its own General Plan. Furthermore, the DEIR identifies more than 40 mitigation measures which are not within the City's Capital Improvement Plan (CIP); therefore, there is no substantial evidence that the County has committed to ensuring that the proposed mitigation measures are fully enforceable. This is a significant concern to the City and is not adequately addressed within the DEIR. More specific concerns, which add to this comment, include:

    a. The Traffic report identifies impacts on several facilities anticipated to operate at less than LOS C that otherwise would be classified as significant and unavoidable or mitigated to achieve a higher LOS, except that the SAP calls for changing the policy to LOS E (Policy TM-12). This is in contrast to the City/County MOU which expressly states that the County will achieve an LOS policy of C for all urban and suburban roadways excepting those that are within a ½ mile of state highways, where LOS D is acceptable.

    b. There are multiple capacity improvements which the DEIR states are within the City's CIP, and on that basis the analysis concludes the impacts are not significant. However, the analysis does not discuss how the project affects the timing of these improvements. The City's CIP identifies when improvements are needed, and bases its funding on that timing. The proposed project will result in many of these improvements being needed much sooner—decades sooner—than had been anticipated, and yet this impact is not discussed. 4-72

    c. 4.14-68 Signal Timing Improvements/Optimization is listed as a mitigation measure that is feasible and is part of the City of Roseville's regular maintenance by City staff. The listed timing changes are not necessarily part of the City's "routine maintenance," however. The City must carefully consider any timing modifications, because adding green time to one movement will necessarily delay other movements, causing further impacts. Therefore, all of these proposed timing modifications must be evaluated to demonstrate that they would mitigate the identified impact without causing other impacts. This analysis should be provided within the DEIR.

    d. A significant number of mitigation measures identified to improve impacts to City facilities are insufficiently analyzed or are infeasible. Examples include the following:

        i. Mitigation Measure - Modify Signal Timing: The signal modification is proposed at multiple locations as a mitigation measure. Timing changes could adversely affect existing signal coordination along major corridors. Additionally, there will be costs associated with retiming individual signals and retiming the corridors. Additional evaluations should be completed to accurately determine the financial and LOS impacts to the City of Roseville. The following corridors require a more thorough investigation:

1. Blue Oaks Blvd Corridor
2. Cirby Way Corridor
3. Douglas Blvd Corridor
4. Pleasant Grove Blvd Corridor
5. Roseville Parkway Corridor

ii. Mitigation Measure – Add Right Turn Overlap/Prohibit U-turn Movement: This mitigation measure is proposed at multiple intersections. In most cases, this would cause impacts that would restrict access to local businesses, and would therefore be infeasible to implement. Furthermore, the structural improvements which would be needed to implement these measures have not been identified, so the costs are unknown and are not contained in any existing fee program. These costs could be significant due to the large quantity of intersections affected. The following intersections are examples of infeasible mitigation:

1. Cirby Way/Riverside Ave Intersection
2. N Sunrise Ave/Lead Hill Blvd Intersection – Business owner opposes restricting u-turns. U-turns were previously restricted and restrictions were removed due to impacts to business owners.
3. Pleasant Grove Blvd/Fiddyment Road Intersection
4. Pleasant Grove Blvd/Washington Blvd Intersection

4-72 cont.

iii. Mitigation Measure – Intersection Widening: This mitigation measure includes construction of additional through and/or turn lanes which would require roadway widening at multiple intersections. Further analysis needs to be completed to evaluate potentially significant improvement costs that currently are not identified in any fee program. These costs include, but are not limited to, ROW acquisition/eminent domain, widening of receiving lanes, existing utility relocations, signal modifications, approval from Caltrans and other jurisdictions, and environmental impacts related to the improvements. Some improvements may not be feasible at all due to proximity to existing structures or City Council action. Some examples include:

1. Cirby Way/Riverside Ave Intersection – Roseville City Council has previously determined via Resolution that a third left turn lane at this location is feasible or desirable.
2. Sunrise Blvd/Douglas Blvd Intersection – Infeasible due to proximity to existing structure.
3. Roseville Parkway/Taylor Road Intersection – The mitigation is to widen west-bound approach to include a fourth through lane, but the facility is constricted by bridges on both sides and is infeasible.

iv. Improvements proposed at the following locations are unclear based on existing geometry:

1. Douglas Blvd/I-80 Offramp
2. Pleasant Grove Blvd/SR-65 Northbound Ramp
3. Pleasant Grove Blvd/SR-65 Southbound Ramps
4. I-80 Westbound Offramp/Riverside Ave
5. SR-65 Northbound Ramps/Stanford Ranch Road

4-72 cont.

60. Page 4.14-63, Mitigation Measure 4.14-3 and 4.14-4 describe a fair-share fee program to offset the impacts to City of Roseville facilities. The measure states that the County "shall negotiate in good faith" with the City "with the intention of achieving, within a reasonable time period after approval [. . .] commitment for the provision of adequate fair share mitigation." The project impacts to City facilities are extensive, and this mitigation measure is not well defined. The City has been requesting the County work cooperatively to craft mutually agreeable transportation mitigation measures since issuance of the NOP on November 3, 2016, so that these measures could be better defined for review by the public by the time of publication of the DEIR, but the County did not do so. The City is very concerned that the language presented in the DEIR about negotiating in "good faith" within a "reasonable time" does not commit the County to specific, feasible actions to offset impacts to City facilities and is, therefore, not enforceable mitigation.

    In addition to lacking a firm commitment, the measure contains extraneous information which complicates the ability to achieve a good faith negotiation. The measure provides that the County may, at its own discretion, choose to include other jurisdictions and the formation of a JPA in the negotiations; this measure is to offset *project impacts* to *City of Roseville facilities*. All mention of negotiations with other jurisdictions and "regional improvements" should be eliminated, as they are unrelated to the impacts the measure is seeking to offset. The measure should also eliminate the explicit requirement that the negotiated agreement contain reciprocity, because again, this measure is to address *project impacts* to *City facilities*. The City agrees that it may be time to consider a broader discussion of a regional transportation fee agreement which includes reciprocity, but that should be a separate negotiation; it is unrelated to this CEQA mitigation measure.

    Finally, the City is concerned that this measure states that fair-share fees are to be paid to Placer County, but does not include language which specifies that the funds are to be held in trust for the City of Roseville, or that the funds must be used to improve the specified facilities within the City.

4-73

61. The following Sunset Area Plan figures require amendment:

    a. Figure 1-2 Draft Land Use Diagram – update Foothills Blvd extension through Duluth

    b. Figure 2-1 Draft Circulation Diagram - update Foothills Blvd extension through Duluth. Is it a 6 lane with median?

    c. Figure 2-2 Bike and Pedestrian Mobility Plan - update Foothills Blvd extension through Duluth

    d. Figure 4.1.1 Circulation Diagram - update Foothills Blvd extension through Duluth

    e. Figure 4.1.2 Bike and Pedestrian Mobility Map - update Foothills Blvd extension through Duluth.

4-74

f. Figure 4.7.1 Foothills Boulevard Location - update Foothills Blvd extension through Duluth – need to show cross section of Duluth

62. The following DEIR figures need to be amended:

a. Exhibit 3-5 SAP Land Use Diagram – update to show Foothills Blvd extension through Duluth

b. 3.6.1 Roadway Improvements Outside the PRSP Area – The extension of Foothills Boulevard through Duluth is shown in Exhibit 3-24 as a project related improvement, however the text in this section does not identify or describe the improvement.

c. Exhibit 4.14-6 Placer Ranch Specific Plan Roadway Network- Foothills Boulevard extension is shown as a 4-lane roadway not the 6 lane as outlined and assumed in the DEIR

d. Exhibit 4.14-7 Sunset Area Plan Network - Foothills Boulevard extension is shown as a 4-lane roadway not the 6 lane as outlined and assumed in the DEIR

e. In addition, figures in the Traffic Impact Study are inconsistent throughout the document, showing portions of Foothills which will be four lanes in some cases and six lanes in others.

4-74 cont.

63. Page 4.14-91, Impact 4.14-13. As with other impacts to City services which have been raised throughout our comments, residents of the project area could be expected to rely on City of Roseville transit services. The DEIR provides no evaluation of transit trip distributions or of potential impacts to City of Roseville Transit. The DEIR should be revised to examine these potential impacts.

4-75

4.15 Utilities

64. The DEIR fails to analyze the impact on the landfill and the Materials Recovery Facility (MRF) due to the proportional increase in solid waste generated by the Project and by full build out of the SAP. The additional solid waste generated as a result of construction and operation of the project will reduce the life-span of the landfill. Expansion of the landfill will result in a financial burden to the rate payers, including Roseville residents. Mitigation should be required to ensure that the project pays its fair share for mitigation of the cumulative impacts to and expansion needs of the landfill. Furthermore, because the analysis did not examine full build-out of the SAP, the DEIR does not analyze the full extent of impacts to landfill capacity and solid waste disposal needs.

4-76

65. A wastewater metering facility location will be required for influent flows directed to the Pleasant Grove Wastewater Treatment plant, but the need for this facility has not been discussed in the DEIR, a location has not been disclosed, nor have the impacts been analyzed. The DEIR should be revised to include this information.

4-77

66. A recycled water metering facility location will be required, but this facility has not been discussed, nor has a location been disclosed in the DEIR and the impacts have not been analyzed. The City requests that this facility be located at the City/Placer Ranch boundary. The DEIR should be revised to include this information.

4-78

67. The Amoruso Ranch Specific Plan plans two 24-inch water stubs which terminate at the edge of the City, on the western boundary of Placer Ranch. DEIR Appendix F, Figure 4-1 shows proposed 12-inch water mains that extend from this location on the City's boundary into the project site,

4-79

ultimately connecting to proposed 42-inch and 24-inch water mains further within Placer Ranch. The purpose of the interties is to provide backup water for "reliability and emergency," as described in the master water plan. If there is need to feed the 42-inch water main, a 12-inch line will be undersized. Instead of reducing the line size, please revise the project to continue 24-inch lines from the City/Project boundary to the interties. **4-79 cont.**

68. Page 4.15-8. Add to recycled water section: "The recycled water system will require a re-evaluation of the recycled water availability at the time of connection. If improvements are needed, they should be paid for by the PRSP and SIA projects." **4-80**

69. Page 4.15-8, Add to recycled water section: "The City of Roseville will provide recycled water to customers on a first come first served basis. Placer County will be given an opportunity to reserve recycled water supply prior to PRSP/SAP development, as considered in the December 2009 South Placer Regional Wastewater Systems Evaluation Final Report." **4-81**

70. Page 4.15-8. The recycled water section of the DEIR must explicitly state whether recycled water demand for PRSP and SAP is within or exceeds the estimated peak day demand considered in the System Evaluation Study. Recycled water will be provided if adequate supply is available, but cannot be guaranteed above the amount contemplated in the study. **4-82**

71. Page 4.15-9, Paragraph 1: The DEIR states that "Placer County and the City of Roseville work together to monitor growth, plan for treatment plant expansions, and ensure that adequate wastewater treatment capacity is available in the SPWA area." This should be revised to reflect the fact that the SPWA partners (Placer County, Roseville and SPMUD), currently work together on the issues described in this sentence. **4-83**

72. Page 4.15-12, 3rd Paragraph: This paragraph should disclose that the SPWA service boundary will be adjusted to include the entire PRSP and SAP. Please reference the study which shows that there is capacity for the additional flow in the sewer distribution system and at the PGWWTP. **4-84**

73. Page 4.15-25, Wastewater section, Paragraph 1, sentence 1: The SPWA does fund regional wastewater facilities, but does not fund recycled water facilities. **4-85**

74. Page 4.15-43, Impact 4.15-3. The net SAP PWWF is listed as 11.76 mgd, but is later listed as 8.49 mgd on page 4.15-45 (PRSP Area). This inconsistency should be corrected. **4-86**

75. Page 4.15-46, Impact 4.15-3, the second paragraph talks about upsizing the 24-inch sewer line to a 27-inch sewer line. Neither the sanitary sewer master plan nor the hydroscience February 2018 technical memo talk about upsizing these lines. Is this still needed? If so, please add a mitigation measure requiring the development within the PRSP and SAP to construct and fund the upsizing of any sewer facilities. **4-87**

76. Page 4.15-47, Impact 4.15-4. A calculation of current flows to the Pleasant Grove Wastewater Treatment Plant (PGWWTP) and the projected flow at buildout of the project are used to show there is capacity at the PGWWTP. Instead of using current flows, an evaluation of the South Placer Wastewater Authority (SPWA) <u>build out</u> flow conditions of the PGWWTP should be used to ensure that total flows at build out do not exceed ultimate capacity of the PGWWTP (24mgd), as this could require expanded capacity and associated environmental impacts that are not analyzed in the DEIR. **4-88**

77. Page 4.15-47, Impact 4.15-4. The flow for the PRSP and SAP used in this section are 1.99 and 3.78 MGD respectively. These flows do not match the sanitary sewer master plan flows of 2.047 and 3.23 MGD respectively (DEIR Appendix H, page 19). **4-89**

78. Page 4.15-48, Table 4.15-10 lists the SAP net ADWF as 3.782 MGD. This conflicts with the sanitary sewer master plan, Appendix H, which state 3.23 ADWF. 4-90

79. In Appendix G, please remove references to the North Zone Pump Station. The intent is to provide recycled water through the line in Woodcreek Oaks Boulevard. 4-91

80. In Appendix G, Section 4.3 Supply and Implementation: Please modify the first paragraph as follows: "…It should be noted that the recycled water supply for the project would be generated either at the Dry Creek or Pleasant Grove WWTPs~~, though the majority of the recycled water sources are assumed to be from the Dry Creek WWTP~~….." 4-92

81. In Appendix H, please remove references to the North Zone Pump Station. The City will determine the best way to provide recycled water to PRSP. 4-93

82. In Appendix H, page 19 states that the Placer Ranch development will generate a total ADWF of 2.045 MGD. This conflicts with the flow stated on page 3 of the SSMP (2.17 MGD ADWF). Please fix the inconsistency. 4-94

Letter 4	City of Roseville Kevin Payne, Assistant City Manager February 22, 2019

4-1 The comment states that the Draft EIR analysis and mitigation measures are inadequate; however, the comment does not provide specific reasons specifying why the Draft EIR is inadequate. See responses below regarding the specific comments in this letter. Also, see Master Response 8: Recirculation.

Regarding the City's request to review the fiscal analysis and development agreements, the County has coordinated with the City of Roseville regarding these items. This is not an environmental issue and no further response is required regarding this issue.

Regarding the oral comments provided by the City's representative at the February 14, 2019, public hearing on the Draft EIR, see responses to comments PH-8 through PH-14.

4-2 The comment states that the Draft EIR conclusion regarding odor-related impacts is incorrect because the commenter asserts that payment of fair share fees is a feasible mitigation measure. See Master Response 4: Odors regarding the requirement of fair-share fees as mitigation for odor impacts and the feasibility of such mitigation.

The comment also notes that "the project analysis of landfill impacts is limited to an analysis based on the existing condition." Indeed, as explained on Draft EIR page 4-3, "the baseline conditions for this Draft EIR are generally the conditions that existed in the SAP area in 2016," consistent with State CEQA Guidelines Section 15125(a). The Draft EIR explains that "[t]his setting generally serves as the baseline against which environmental impacts are evaluated." Therefore, the Draft EIR properly analyzes impacts associated with the landfill against existing conditions.

In Table 4.0-2, on page 4-10, the Draft EIR lists the Western Placer Waste Management Authority Waste Action Plan as a cumulative project. Acreage and nonresidential square feet or acres are listed as "TBD." The discussion of cumulative impacts in an EIR must contain "[a] summary of the expected environmental effects" (State CEQA Guidelines Section 15130[b][4]). Section 15130(b) requires that the discussion "be guided by the standards of practicality and reasonableness." As indicated by Table 4.0-2, insufficient information is known about the expansion plans to consider it

in the cumulative impact analysis. As noted in comment 10-3, submitted by Churchwell White LLP on behalf of WPWMA, the "expansion plans remain highly conceptual and are not yet complete." Therefore, the cumulative analysis in the EIR appropriately does not consider expansion of the WRSL in the cumulative impact analysis.

4-3 The comment states that the proposed project results in a significant traffic impact in Roseville by decreasing the number of signalized intersections in the City that operate at LOS C or better from 84 percent to 68 percent, which is lower than the 70 percent standard identified in the City of Roseville General Plan. The comment further states that the Draft EIR identifies improvements in mitigation measures, which are not currently identified in the City's Capital Improvement Plan (CIP). The comment also expresses concern regarding the fair-share fee program approach identified in Mitigation Measures 4.14-3 and 4.14-4 of the Draft EIR.

The improvements not currently identified in the City's CIP are generally not necessary when the timing of the proposed project, reasonably foreseeable regional roadway improvements, and forecasted land development are considered. Since the traffic generated by the proposed project would occur over an extended period of time, the impacts causing the need for these improvements would not occur until after reasonably foreseeable regional roadway improvements and forecasted land development are completed. These completed projects will result in substantially different travel patterns, which are captured in the cumulative plus project traffic analysis.

As shown in Tables 4.14-39 and 4.14-40 on pages 4.14-123 and 4.14-125 of the Draft EIR, the cumulative plus project traffic analysis shows that more than 70 percent of signalized intersections would operate at LOS C or better when reasonably foreseeable regional roadway improvements are considered. Since the proposed project would occur over an extended period of time, the cumulative plus project traffic analysis is a more realistic representation of the project's traffic effects, particularly when considering the reasonably foreseeable roadway and land use projects that will also be completed at that time.

Fair-share funding for improvements at City of Roseville locations would be incorporated into the development agreement between Placer County and the landowner in the PRSP area. Placer County would work with the City of Roseville to determine this fair-share fee.

4-4 The comment suggests that the Foothills Boulevard extension should be a required project improvement. The comment expresses concern that the impacts to Fiddyment Road and Woodcreek Oaks Boulevard are underestimated in the Draft EIR. The comment also expresses concern regarding the timing and funding of the Foothills Boulevard extension.

The Foothills Boulevard extension is not included as part of the project and is not required to provide access to the PRSP area. As described on page 4.14-35 of the Draft EIR, access to the project is provided by several roadways independent of the Foothills Boulevard extension. However, Impact 4.14-1, Impact 4.14-3, and Mitigation Measure 4.14-1b acknowledge that the Foothills Boulevard extension is a necessary improvement to mitigate significant impacts to traffic operations in Placer County and the City of Roseville. As described on page 4.14-51 of the Draft EIR, the existing access routes into the project would provide sufficient access until 50 percent of the development in the PRSP area is completed, at which point traffic operations would be degraded to a significant level and the Foothills Boulevard extension would be necessary to provide an additional access point.

Significant impacts to Fiddyment Road and Woodcreek Oaks Boulevard south of the PRSP area are appropriately analyzed in the traffic analysis, as described in Impact 4.14-3 and Impact 4.14-4. The Draft EIR notes that project impacts to the intersections along these roadways would be significant without the Foothills Boulevard extension.

The timing of when the Foothills Boulevard extension is necessary is based on forecasted traffic levels on Fiddyment Road, Woodcreek Oaks Boulevard, Blue Oaks Boulevard, and Sunset Boulevard

at an interim year (2025). These interim year forecasts consider anticipated growth in the West Roseville and Sierra Vista Specific Plans, as provided by City of Roseville planning staff.

4-5 The comment suggests that the project as proposed would result in increased demands on City of Roseville services and recommends revised mitigation measures to ensure that the project would meet anticipated service demands, in order to avoid impacts to City of Roseville services and facilities.

Potential impacts related to increased demand for fire protection and emergency response services were evaluated in Impact 4.13-1 of the Draft EIR. Impacts were found to be potentially significant, and Mitigation Measures 4.13-1a and 4.13-1b would be implemented to reduce this impact. (See minor revision to Mitigation Measure 4.13-1b described in response to comment 3-15.) Mitigation Measure 4.13-1a requires the project proponent to annex into an existing CSA Zone of Benefit or create a CFD to fund the revenue required for operations, training, maintenance, and personnel costs associated with maintaining the staffing ratios identified in Table 4.13-5 on page 4.13-24 of the Draft EIR. This is required prior to recordation of the Final Subdivision Maps or approval of Improvement Plans for each property, whichever occurs first. Mitigation Measure 4.13-1b requires a minimum of two new fire stations to serve the net SAP and PRSP areas, the environmental effects of which are evaluated as part of the project. Mitigation Measure 4.13-1b requires construction of the fire stations based on need and maintaining staffing ratios; as mentioned in response to comment 3-15, Placer County Fire anticipates that the second fire station would be needed around 25 percent buildout of PRSP. These mitigation measures include timing and performance standards and would reduce impacts to a less-than-significant level.

Potential impacts related to increased demand for law enforcement services were evaluated in Impact 4.13-2 of the Draft EIR. The analysis noted that a sheriff's substation is currently identified in the Placer Vineyards Specific Plan area, approximately 5 miles southwest of the project area. While funding mechanisms would ensure that there is sufficient funding, impacts would be potentially significant because the funding mechanisms were not yet in place. Mitigation Measure 4.13-2 would be implemented to reduce this impact to a less-than-significant level and requires the project proponent to annex into an existing CSA Zone of Benefit or create a CFD to fund the revenue required for operations, training, maintenance, and personnel costs. Similar to Mitigation Measure 4.13-1a, this is required prior to recordation of the Final Subdivision Maps or approval of Improvement Plans for each property, whichever occurs first. The mitigation measure includes timing and performance standards and would reduce impacts to a less-than-significant level.

4-6 The comment suggests that the evaluation of parkland provides credit for private facilities not open to the public, does not include the residential uses within the SAP, and does not comply with Placer County standards.

Page 4.13-7 of the Draft EIR notes that the project area includes existing privately owned and operated recreational facilities. Goals and policies of the Placer County General Plan encourage the development of private recreational facilities, but do not allow for parkland credit for private facilities.

As discussed in Impact 4.13-5, development in the net SAP area would generate an estimate 6,095 new residents and would require development of 60.5 acres each of active parkland and passive recreation area, open space with public access, or paseos. Additionally, 6.1 miles of trails would be required for the net SAP area. While the exact location and characteristics of these areas cannot be known at this time due to the programmatic nature of the SAP, there is sufficient land within the net SAP area to provide the required parkland acreage. While there are no proposed parkland areas in the net SAP area at this time, parkland dedication consistent with Placer County requirements would be developed concurrently with new residential development (see General Plan Policy 5.A.23). Thus, while parkland for the net SAP area has not yet be identified, there is sufficient land and it is

anticipated that parkland dedication and development would occur concurrently with residential development in the net SAP area.

Table 4.13-10 of the Draft EIR presents information regarding the type of recreation facility, the acreage or mileage required, the acreage or mileage provided, the credit received for each and whether the PRSP would meet the requirements. The information presented in the table shows that the PRSP would receive credit for 309.9 acres but that only 132.2 acres is required. Thus, the PRSP would meet County General Plan requirements for parks and open space dedication.

4-7 The comment states that the Draft EIR did not consider the project's effects on the lifespan of the landfill or build-out flows of the Pleasant Grove Wastewater Treatment Plant. The Draft EIR included an evaluation of project-related impacts to WRSL capacity. Impact 4.14-6 concludes the impact is less-than-significant because, after the recycling and diversion requirements for construction waste in the net SAP area and PRSP area are met, a total of 192,695 cubic yards of construction waste would remain, which would be 0.8 percent of the remaining capacity at WRSL. The Draft EIR also evaluated the project's cumulative contribution (including full buildout of the PRSP area and net SAP area) to WRSL capacity and, with implementation of SAP and General Plan policies, the project's contribution to impacts related to WRSL capacity exceedance is considered less than significant. (See Cumulative Impact 4.15-17.) No mitigation measures are required. Regarding wastewater flows, Impact 4.14-4 evaluates potential impacts to water treatment services associated with "wastewater flows generated "by buildout of the PRSP and net SAP areas." Furthermore, Cumulative Impact 4.15-15 evaluates the project's contribution to wastewater treatment capacity issues associated with implementation of cumulative projects (see Table 4.15-14 in the Draft EIR). Mitigation Measures 4.15-4a and 4.15-4b require annexation into SPWA's and Pleasant Grove Wastewater Treatment Plant's (PGWWTP's) service areas and confirmation of infrastructure capacity and reduce the project's cumulative contribution such that the project's cumulative impact is less than significant. All of the issues raised by the commenter are fully evaluated in the Draft EIR, and no revisions are required.

4-8 The comment suggests that Mitigation Measure 4.9-1b is insufficient because it does not require payment of fees to the City of Roseville, establish or discuss operational and maintenance funding, or reference the Pleasant Grove Retention Facility. This is because the City's Pleasant Grove Retention Facility is not the only retention option identified in the Draft EIR and because the Draft EIR is clear elsewhere regarding the funding for the Pleasant Grove Retention Facility (should that become the selected retention option). As stated in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize Roseville's regional detention facility, the party would enter into a Funding Agreement with the City of Roseville to determine fair-share fiscal impacts associated with utilization of said facility. Costs to participate in the Pleasant Grove Retention Facility would be negotiated with the City of Roseville as the basin is owned by the City of Roseville. Preliminary analysis was included within the EIR. Subsequent analysis may be needed.

The Draft EIR further states (page 3-69): "To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, a fee program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements."

See Master Response 6: Drainage and Flooding and also Master Response 9: Mitigation and Development Fees.

4-9 The comment states that the Draft EIR does not examine the project in light of the planned landfill expansion, nor does it require right-of-way dedication for Placer Parkway. See response to comment 4-2 regarding consideration of the landfill expansion in the cumulative impact analysis. See response to comment 4-25 regarding Placer Parkway right-of-way dedication.

4-10 The comment raises general issues regarding the visual impact analysis in the Draft EIR. Comment 4-35 provides a more detailed version of this comment. See response to comment 4-35.

4-11 The comment expresses concern regarding the timing of mitigation measures in relationship to the timing of project phasing and construction. The comment does not identify specific issues with specific mitigation measures. The Draft EIR identifies timing for mitigation measures. Also, while not clearly expressed, the comment appears to be related to the PRSP. Per Section 17.58.200 of the County's Zoning Ordinance, the County is requiring approval of a Development Agreement for the PRSP. The PRSP Development Agreement sets forth regulations that the PRSP would be subject to including provisions related to the timing and triggers for mitigation. The SAP is an area plan and therefore, rather than identifying specific development, it guides the general types and intensities of development within the Sunset Area. Therefore, specific development phasing is not included in the SAP, and, in many cases, timing of improvements cannot be as specifically identified as it can in the Development Agreement for the PRSP. As mentioned, however, the Draft EIR includes timing mechanisms as appropriate for mitigation measures. See the Mitigation Monitoring and Reporting Plan included as Chapter 4 of this Final EIR which more clearly presents the timing mechanisms identified in each mitigation measure.

4-12 The comment states that mitigation measures related to the City of Roseville Power Plant 2 (RPP2) do not include specific performance criteria to ensure adequate sound attenuation would be achieved. However, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR specifically states that noise from the RPP2, at future planned receptors, shall not "exceed Placer County land use compatibility standards (e.g., 60 A-decibels [dBA] Day-Night Sound Level/ Community Noise Equivalent Level [L_{dn}/CNEL] for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA Equivalent Continuous Sound Level [L_{eq}]/65 dBA Maximum Sound Level [L_{max}] [night], 55 dBA L_{eq}/70 dBA L_{max} [day])." The mitigation measure further requires that a sound wall be constructed between the existing power plant and future planned receptors that achieves, at a minimum, a 5-dB reduction in sound. The combination of noise standards and design criteria for the sound wall are specific performance criteria that would ensure future planned receptors are not exposed to noise levels that exceed applicable standards. Minor revisions to Mitigation Measure 4.11-4b were made in response to comment 4-50 below. See Chapter 2, "Revisions to the Draft EIR," for the specific text changes. These are also described in response to comment 4-50.

4-13 The comment expresses concern about the Draft EIR cumulative impact analysis. See Master Response 7: Program- vs. Project-Level Analysis for a discussion regarding the level of detail for the SAP and the PRSP. Regarding the level of detail of the cumulative traffic analysis, the Draft EIR (page 4.14-2) explains that because buildout of the SAP is anticipated to occur over an extended time period (i.e., 80+ years) based on current market forecasts, the current travel models with their 20-year horizons are not equipped to accurately forecast detailed traffic conditions associated with an 80+ year buildout timeframe. Therefore, this scenario is evaluated at a lesser level of detail, consistent with Section 15130(b) of the State CEQA Guidelines, in recognition of the higher level of uncertainty associated with this level of development and a timeframe that would occur well beyond 20 years. This scenario is intended to describe the overall cumulative travel effects of the buildout of the SAP using trip generation and ADT forecasts to provide a cumulative impact analysis. No additional traffic analysis is required. It should be noted, however, that in response to comments regarding development capacity and to provide the requirement for future traffic analysis for projects that exceed the 20-year horizon forecast, SAP Policy TM-1.9 on page 4.14-40 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- **Policy TM-1.9: Additional Traffic Impact Mitigation.** The County ~~shall~~ may require ~~applicants~~ further traffic analysis for land development projects ~~to demonstrate consistency~~ that are not consistent with the EIR land use assumptions ~~of the EIR~~ for this Plan. ~~For projects that exceed these assumptions, the County will require additional traffic analysis and mitigation of impacts identified in the analysis.~~ Future projects that exceed the level of development evaluated under the EIR's projected 20-year development scenario (see EIR Table 3-3), will be required to prepare individual, project-specific traffic analysis, and identify specific mitigation measures to mitigate impacts as necessary. Mitigation could include contribution to funding of transportation system improvement (e.g., traffic fees, VMT fees) and/or dedication of right-of-way for future improvements.

4-14 This is primarily a repeat of comment 4-13. See response to comment 4-13, above.

4-15 The comment summarizes CEQA requirements for legally adequate mitigation measures and states that the Draft EIR must address and analyze specific mitigation measures for impacts to the City of Roseville. More detailed comments about specific mitigation measures in the Draft EIR are provided later in this letter. See the responses, below, to the more detailed comments. Also, see Master Response 9: Mitigation and Development Fees.

4-16 The comment requests that the EIR's list of required permits and approvals should include an agreement with the City of Roseville delineating fair-share obligations for impact to roadways within Roseville. These issues are addressed in the Development Agreement for the PRSP. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. This comment is noted for consideration.

4-17 The comment states that a City/County funding agreement is required prior to commencement of development that requires Placer County to provide funding for all costs associated with developing a stormwater retention/detention storage solution. Section 2.3, "Required Permits and Approvals," of the Draft EIR notes that an "agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility" would be required if the County elects to utilize this facility for retention. The comment is acknowledged and, as consistent with the statement in Section 2.3 of the Draft EIR, if the County or developer seeks to utilize Roseville's regional detention facility, the party would enter into a Funding Agreement with the City of Roseville to determine fair-share fiscal impacts associated with utilization of said facility. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.

4-18 The comment is seeking clarification on the type of rubberized concrete required by Mitigation Measure 4.11-5a and suggests that a process or program should be required to ensure regular maintenance of the rubberized asphalt concrete (RAC). In addition, the comment suggests that RAC should not be used on truck routes as it is much less effective in this application.

To clarify what type of concrete is required, Mitigation Measure 4.11-5a on page 4.11-43 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-5a: Reduce noise levels associated with new, expanded, or extended roads (Net SAP Area and PRSP Area)

Before finalizing roadway design for roadway expansion or new roadway construction, a design-level acoustical study shall be prepared to identify specific roadway design considerations, which shall be incorporated into final road design and approved by Placer County for roadways that result in a substantial increase in noise identified by Tables 4.11-12, 4.11-13, and 4.11-14. Roadway segments outside of Placer County are excluded (Fiddyment Road extension, Foothills Boulevard extension, and Woodcreek Oaks Boulevard extension). The following design features shall be considered:

- Roadway design shall provide sufficient setback between occupied structures that are defined as sensitive land uses by Placer County (or planned future sensitive land uses) and the roadway to minimize noise exposure to the extent feasible.

- In locations where setback is not feasible to reduce noise levels at existing or planned future sensitive receptors, roadway design shall incorporate quiet pavement types such as rubberized asphalt concrete (RAC) achieving at least a 4-dB decrease in traffic noise where feasible.

- Where existing sensitive receptors are located such that neither setback, nor quiet pavement, can reduce traffic noise from new or expanded roads associated with the project, the County shall coordinate with property owners of the existing residences regarding installation of sound walls along property lines to minimize traffic noise to meet exterior noise standards (city or County, as applicable) and, if necessary to meet the 45-dBA interior noise standards, upgrading windows that face the new or extended roadway.

Regarding regular maintenance of the RAC, as indicated in Mitigation Measure 4.11-5a, a design-level acoustical study would be prepared prior to the construction of new roadways. The acoustical study would consider and recommend feasible measures, which may include the use of RAC at that time, but this measure may not necessarily be implemented on every roadway where a noise impact has been identified. Similarly, if a noise impact were identified on a designated truck route then the acoustical study would ensure that appropriate noise-reducing measures are implemented. In addition, should RAC be implemented on certain roadways, like any other roadway within the county, regular maintenance and repairs would occur on an ongoing basis, as needed. The surrounding cities currently have funding programs in place to maintain city roads and transportation facilities and also would likely experience an increase in revenues related to increase in sales tax associated with visitor spending at shopping malls, restaurants and other establishments that generate revenue for the city. It should be further noted that according to CalRecycle, RAC can last up to 50 percent longer than traditional material, resulting in lower maintenance costs (CalRecycle 2018). No changes are necessary.

4-19 The comment erroneously refers to Mitigation Measure 4.13-8 on page 2-79 of the Draft EIR. As shown on page 2-79 and stated on page 4.13-42 of the Draft EIR, impacts related to consistency with applicable General Plan policies would be less than significant and no mitigation is required. Mitigation Measure 4.13-8 occurs on page 4.13-40 of the Draft EIR requires creation or annexation into a CFD for road maintenance. The surrounding cities currently have funding programs in place to maintain city roads and transportation facilities and also see an increase in revenues related to increase in sales tax associated with visitor spending at shopping malls, restaurants and other establishments that generate revenue for the city. Therefore, no additional mitigation is necessary.

4-20 The comment asserts that the widening of Sunset Boulevard identified in Mitigation Measure 4.14-1a needs to occur before the first building occupancy. As described on page 4.14-51 of the Draft EIR, approximately 25 percent of the development in the PRSP area could be developed before operations degrade to a significant level. This timing is based on forecasted traffic levels on Sunset Boulevard at an interim year (2025). These interim year forecasts consider anticipated growth in the West Roseville and Sierra Vista Specific Plans, as provided by City of Roseville planning staff.

4-21 See response to comment 4-4 regarding the extension of Foothills Boulevard.

4-22 The comment asserts that the impact fees identified in Mitigation Measure 4.14-3 should include the cost of timing new signals and retiming existing signals. Each agency controls and maintains traffic signals within their jurisdiction, which includes timing new signals and retiming existing traffic signals as part of their regular maintenance to respond to changes in traffic patterns.

4-23 The comment requests that fair share contributions in Mitigation Measure 4.14-10 include Placer Parkway. As described on page 4.14-50 of the Draft EIR, development within the PRSP and net SAP areas shall pay the applicable South Placer Regional Transportation Authority (SPRTA) fees. Development within the PRSP area will also be required to pay the Tier II Placer Parkway fee, which also provides funding for Placer Parkway. Development in the net SAP area is not subject to the Tier II Placer Parkway fee.

4-24 The comment requests that Draft EIR Exhibit 3-3 be updated to reflect the annexation of the Amoruso Ranch Specific Plan into the City of Roseville boundaries, which was approved by the Placer County LAFCO in December 2018. See revised Exhibit 3-3 in Chapter 2, "Revisions to the Draft EIR." Throughout the Draft EIR, the Amoruso Ranch project is considered a City of Roseville project. Therefore, the minor official change in City of Roseville boundaries does not change any of the analysis or conclusions of the Draft EIR.

4-25 The comment indicates that objectives should integrate Placer Parkway. Chapter 3, "Project Description," of the Draft EIR notes on page 3-21 that "because an EIR was certified for Placer Parkway and the project was approved, this EIR evaluates impacts of Placer Parkway in a cumulative context only and not as a project-specific element." The proposed Placer Parkway project corridor was selected following the completion of a Final Tier I environmental review (FHWA-CA-FEIS-2009-46 and SCH No. 2003092069) to select and preserve a 500- to 1,000-foot-wide corridor. The preferred alternative would connect SR 99 at Sankey Road to SR 65 at Whitney Ranch Parkway (South Placer Regional Transportation Authority 2009).

The Final Tier I review was completed on December 3, 2009 when the South Placer Regional Transportation Authority (SPRTA) Board certified the Final Program EIR and adopted Findings, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program for CEQA compliance (SPRTA Board Resolution #09-06). The SPRTA Board also selected the Placer Parkway Corridor – Alternative #5 with a No-Access Buffer (SPRTA Board Resolution #09-07). On May 7, 2010, FHWA completed the Record of Decision for NEPA, selecting Alternative #5 as the preferred alternative.

A Project Study Report–Project Report (PSR-PR) was completed and approved on September 29, 2010 (EA 03-2C5900) for the Whitney Ranch Parkway connection at SR 65. Whitney Ranch Parkway is the easterly extension of Placer Parkway beyond SR 65. This included a Type L-7 partial cloverleaf interchange for the southbound ramps and a Type L-2 spread diamond interchange for the northbound ramps with a three-lane overcrossing connecting the two sides. Northbound and southbound auxiliary lanes between Sunset Boulevard and Whitney Ranch Parkway were proposed along SR 65 to improve the operations. Each on-ramp would include provisions for ramp metering and an HOV preferential lane. A Supplemental PSR-PR, completed in October 2013, stages the interchange into two phases. The interim interchange includes the off-ramp and slip on-ramp to northbound SR 65, the loop on-ramp to southbound, and a three-lane overcrossing of SR 65. The auxiliary lanes, the southbound diagonal on-ramp and off-ramp, and widening of the overcrossing are deferred until the Placer Parkway Phase 1 Project was constructed.

A cooperative agreement between the City of Rocklin and the State of California was executed on October 24, 2013 to cover work on Plans, Specifications, and Estimate (PS&E), and right-of-way efforts for the Whitney Ranch Parkway Interchange. The interim phase of SR 65/Whitney Ranch Parkway (Placer Parkway) completed construction and was opened to traffic in 2016.

A Project Study Report – Project Development Support was completed and approved on June 1, 2012 (EA-2F920K) for the Placer Parkway Phase 1. The Placer County Board of Supervisors completed CEQA approvals by adopting the Initial Study/Mitigated Negative Declaration (IS/MND) for Placer Parkway Phase 1 on September 1, 2015. A Categorical Exclusion (CE) for NEPA approval was obtained on June 15, 2017. The Final Project Report was approved for Placer Parkway Phase 1 on August 23, 2017.

The Placer Parkway Phase 1 Project also includes the following elements:

- a four-lane grade-separated structure over Industrial Avenue and UPRR tracks,
- a new at-grade connection at Foothills Boulevard,
- a four-lane extension from SR 65 to Foothills Boulevard with a striped median, and
- widening of Whitney Ranch Parkway from SR 65 to University Avenue to six lanes.

The SR 65/Placer Parkway/Whitney Ranch Parkway interchange is an integral component of the ultimate Placer Parkway project. The project would include a standard L-9, partial cloverleaf interchange at SR 65. Improvements to the interchange include the following elements:

- widening the SR 65 overcrossing to six lanes,
- widening the southbound off-ramp,
- adding a southbound on-ramp,
- widening the northbound off-ramp,
- adding a northbound loop on-ramp, and
- adding auxiliary lanes between the interchange and the Twelve Bridge Drive interchange.

As noted on page 3-32 of the Draft EIR,

> Future development that would occur with implementation of the PRSP would be consistent with the land use designations, which are described individually below and summarized in Table 3-4, and would comply with the Placer Ranch Development Standards, a companion document to the PRSP. The development standards provide the specific zoning regulations for land development projects and contain details regarding permitted uses, yard setbacks, site coverage, building height, and other similar restrictions. In addition, the Placer Ranch Design Guidelines provide specific design expectations for development projects within the PRSP area.

Placer Parkway right-of-way is identified on the PRSP Land Use Plan (Figure 4-1 in the PRSP Specific Plan documents) and Exhibit 3-11 in the Draft EIR. Parcel PR 200 is identified as Placer Parkway with approximately 158.51 acres identified (Table 4-1 PRSP Specific Plan) and Placer Parkway right-of-way estimates are noted in the Draft EIR Table 3-4. The PRSP Development Agreement defines the timing and triggers associated with dedication of right-of-way.

Section 4.6 of the SAP Corridor Design Standards and Guidelines also provides additional corridor guidelines for Placer Parkway.

4-26 The comment notes that Table 3-3 in the Draft EIR does not list any housing units for residential development that could be built within the commercial and industrial zones. The comment requests that because the project includes allowances for up to 30 units per acre in these zones, the table should be amended to show the amount of residential development assumed, most notably the residential assumptions used in the traffic study for these zones. The traffic scenario "Projected 20-Year Development" for the "SAP Area, Excluding PRSP," is based on the EPS market analysis as described on page 3-27of the Traffic Impact Study (included as Appendix M of the Draft EIR). The market analysis found that the vast majority of residential development within the 20-year timeframe is anticipated to occur in other areas within the region that are specifically designated for residential uses, including approved specific plans in Roseville, Rocklin, and Lincoln. This is reflected in the cumulative traffic analysis, as described on page 4.14-94 of the Draft EIR. The market analysis did forecast that within the 20-year buildout, 320 residential dwelling units could be expected in the SAP area, excluding the PRSP area. This is illustrated in Table 3-3 if the Traffic Impact Study.

4-27 The comment suggests that Exhibit 3-7 in the Draft EIR project description should be modified to show widened sections of Foothills Boulevard and Industrial Avenue within the City of Roseville and that this widening should be figured into the project cost and/or accounted for in the mitigation fee.

Exhibit 3-7 illustrates the circulation diagram for the roadway network within the SAP. This diagram is not intended to show the entire mitigated roadway network in the region and therefore no revisions are necessary.

4-28 The comment requests additional information for bus rapid transit (BRT). Page 3-26 of the Draft EIR (identified by the commenter) provides a summary of the transit features included in the SAP policies. Page 3-49 of the Draft EIR includes more specific transit features identified in the PRSP. Exhibit 3-18 in the Draft EIR illustrates locations for bus pullouts and shelters, including a conceptual route for BRT in the project area. Also, the project is required to prepare a transit master plan in which the detailed elements of the transit system would be provided.

4-29 The comment states that the City of Roseville will need to determine which plant or plants would deliver recycled water to the project, as noted in the fourth paragraph on page 3-55 of the Draft EIR. (The text referenced in the comment occurs on page 3-53 of the Draft EIR.) The comment notes that the plant or plants will be chosen based on capacity and that it would be premature to determine which one would be selected. The comment raises the general topic of recycled water does not identify any specific issues with the analysis provided in the Draft EIR. The project's potential recycled water impacts are addressed in the Draft EIR in Section 4.15, "Utilities," and mitigation measures to reduce potentially significant impacts are identified therein.

4-30 The comment suggests that there is a discrepancy between the average dry weather flow (ADWF) identified on page 3-55 of the Draft EIR, in the master sewer plan, and in Section 4.15, "Utilities," of the Draft EIR. The Draft EIR (page 4.15-66) explains the reason for the two ADWF numbers: "the Systems Evaluation estimated flows from the PRSP area development to be 2.17 million gallons per day (mgd) ADWF (RMC Water and Environment 2009:3-5 and 3-6). Development in the PRSP area is anticipated to generate an estimated 1.99 mgd ADWF, which is lower than the wastewater flows anticipated by the Systems Evaluation." No revisions to the Draft EIR are needed.

4-31 The comment suggests various considerations for the fees for Pleasant Grove Retention Facility. See response to comment 4-17.

4-32 The comment suggests that the segment of Foothills Boulevard within the City should be included in the discussion contained on page 3-64 of the Draft EIR. In addition, the comment states that the Draft EIR references the Foothills Business Park Annexation EIR but that document contained a different alignment and number of lanes, so it cannot be entirely relied on. The list of supporting infrastructure included on page 3-64 of the Draft EIR is limited to those projects that are required as part of the PRSP project but that are located outside of the PRSP area and were assumed to be included as part of the project description. The extension of Foothills Boulevard is required as mitigation as discussed on page 3-79 of the Draft EIR as part of the "Off-site Roadway Widening and Extension Identified as Mitigation" section and not included in the project description and therefore is not appropriate to list in this section of the document.

The alignment of Foothills Boulevard is consistent with the alignment included in the Foothills Business Park Annexation EIR. In addition, the Foothills Business Park Annexation EIR (page 4.5-34) identifies the Foothills Boulevard extension as a four-lane facility. However, the right-of-way width approved as part of the Foothills Business Park Annexation project (100-foot right of way per City's standard plan for a major arterial [ST-9]) is appropriate to accommodate the six-lane facility required as mitigation in the Draft EIR for the SAP/PRSP. It is therefore expected that there is sufficient right-of-way in the area evaluated in the previous EIR to accommodate the future roadway.

4-33 The comment suggests that the reference on page 3-69 of the Draft EIR to the Pleasant Grove Retention Facility fee program should note that a mechanism is in place to fund all associated costs for property acquisition, environmental review, design, construction, operation, and maintenance. In response to this comment, the last paragraph on page 3-69 of the Draft EIR is revised as follows:

> To ensure that a mechanism is in place to fund construction of the project's proportionate share of retention at the City of Roseville's Pleasant Grove Retention Facility, including costs associated with property acquisition, environmental review, design construction, operation, and maintenance, a fee program (or equivalent mechanism) would be required, and fees would be collected by the County with each building permit. At such time that adequate funds have been collected, retention facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs. If the City and County are unable to memorialize a joint-facilities agreement (or equivalent mechanism), construction of equivalent retention facilities, whether on-site or elsewhere off-site, would be required. Lastly, interim on-site retention facilities may be developed unless or until the Pleasant Grove Retention Facility is online, to fully accommodate the project's long-term stormwater volumetric requirements.

4-34 The comment notes that Foothills Boulevard is listed as a four-lane arterial on page 3-79 of the Draft EIR and in other sections of the document it is identified as a six-lane facility and requests fees for off-site mitigation of Blue Oaks Boulevard and Roseville Parkway. The section of the Draft EIR referenced containing the four-lane arterial is for the PRSP, which requires Foothills Boulevard as a four-lane arterial. Foothills Boulevard is identified as a six-lane facility for the SAP, which is consistent with the Draft EIR's description and analysis.

Section 4.14, "Transportation and Circulation," of the Draft EIR did not identify significant impacts on Blue Oaks Boulevard or Roseville Parkway; therefore, no mitigation was identified for the project. No revision to the Draft EIR is required.

4-35 The commenter asserts the update to the SAP will substantially increase development potential over the existing SIA Plan. To clarify, the baseline conditions for the environmental analysis under CEQA are the current conditions at the project area, as described in Draft EIR Section 4.0.3, "Baseline"; the baseline for the environmental analysis is not the buildout or planned development under the SIA Plan.

The commenter suggests that the absence of photosimulations from Viewpoint 6 in Roseville makes it difficult to understand the scope of visual impacts. While the comment is acknowledged, it is also true that, because no specific project developments are proposed or would be approved with adoption of the SAP and PRSP, photosimulations that depict specific development would be premature and potentially misleading. Moreover, CEQA does not require visual simulations. Rather, the content, level of specificity, and degree of detail for the aesthetics analysis are dictated by several State CEQA Guidelines sections. For example, Section 15146 requires that the degree of specificity required in an EIR correspond to the degree of specificity involved in the underlying activity described in the EIR, and Section 15145 indicates that a lead agency need not evaluate an impact that would be too speculative. As explained in this response to comment, visual simulations are not necessary to evaluate impacts, and visual simulations would require speculation.

Views from the city of Roseville would be of the PRSP area because the city is adjacent to the southern border of the PRSP area. As described in Draft EIR Section 4.0.1, "Program- and Project-Level Environmental Review," the PRSP is evaluated in the EIR at a project level. An evaluation of the visual change at Viewpoint 6 is provided on Draft EIR page 4.1-23, which states:

> This area would have low-density single family homes around a central park space. It is unlikely that an area slated for development of residential uses could be designed to maintain rural character of the PRSP area consistent with *Placer County General Plan* Policy 1.0.4.... Visual character would change from dominantly agricultural/grazing land to residential. Unity would increase to moderately high because the view would contain all residential development that would be consistent with proposed Placer Ranch Development Standards and Design Guidelines, though design of new homes may not be consistent with the design of the existing development partially visible from Viewpoint 6. Similarly, because of the homogeneity of development, there would be minimal intrusions that are not consistent with the visual characteristics of residential development. Therefore, intactness

would be moderately high. Although visual quality would increase, impacts would be potentially significant because of the substantial change in visual character where the PRSP proposes development in areas where there is some existing development but agricultural/grazing land is visually dominant.

Therefore, consistent with the State CEQA Guidelines direction on level of detail and speculation, the Draft EIR describes that the area seen from Viewpoint 6 would contain single-family homes that are designed consistent with the proposed Placer Ranch Development Standards and Design Guidelines. More detail about the appearance of homes and the development would be required to create an accurate visual simulation of the view from Viewpoint 6.

Providing additional descriptions of the appearance of homes, such as design, layout, or color, would be speculative. Such specifics would be chosen by the developer at the time of obtaining subsequent development entitlements, which are not currently being sought. By extension, creating a visual simulation that is accurate would require speculation. Therefore, the EIR does not contain photosimulations, and the analysis is adequate under CEQA. Furthermore, the commenter does not explain why the written analysis without photosimulations makes it difficult to understand the scope of the impacts; therefore, no additional response to this part of the comment can be provided.

The commenter also states that a view's quality and the impact on the view's quality depend on viewing location and viewer group observing the view. To clarify the approach used in the Draft EIR for assessing visual quality, visual quality is determined through an evaluation of vividness, intactness, and unity, as described on Draft EIR page 4.1-2. And, as described on Draft EIR page 4.1-14, the following factors are considered in evaluating visual impacts:

- existing visual qualities of the affected environment and specific changes to its visual character and qualities;
- the visual context of the affected environment;
- the extent to which the affected environment contains place or features that provide unique visual experiences or that have been designated in plans and policies for protection or special consideration; and
- the sensitivity of viewers, access of viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the project-related changes.

The commenter claims the viewpoints included in the Draft EIR are not representative of viewpoints observed by the public in those locations, that the photos do not represent actual views, and that the photos ensure there are encroachments in the foreground to distort the actual view. As explained on Draft EIR page 4.1-5, the key viewpoints "represent typical views in the project area and provide an overall sense of the visual setting of the project area and a basis for describing the range of impacts that would occur with project implementation." The Draft EIR further explains on page 4.1-5 that "[t]he viewpoints are not intended to identify important views or specific visual characteristics."

Much of this response focuses on Viewpoint 6 because the commenter uses Viewpoint 6 as an example. The commenter is correct that some photos contain encroachments in the foreground; however, these encroachments are common and therefore appropriately and accurately included in the photographs from key viewpoints. Consistent with the Placer County General Plan goals and policies (e.g., Policy 1.O.3, Policy 1.K.3, and Policy 1.O.10), the analysis in the Draft EIR focuses on public views. Most of the portion of Roseville area adjacent to the PRSP area contains private residential development. Other than Viewpoint 6, public views of the PRSP area from Roseville are located at dead ends that are unlikely to be visited by substantial numbers of viewers. Public viewpoints from Roseville of the PRSP area include a portion of a pedestrian pathway from Brick Mason Circle that dead-ends at the PRSP area, a dead end of Grove Hill Way, Fiddyment Road (Viewpoint 6, which continues through the PRSP area), and a dead end of Woodcreek Oaks Boulevard. Therefore, the view from Viewpoint 6 is the most representative viewpoint of the PRSP

area from Roseville because it is the public point from which most viewers in Roseville would see the PRSP area. The description of Viewpoint 6 on Draft EIR page 4.1-12 notes encroaching elements such as a power line and road in the view of the PRSP area. Therefore, the encroaching elements are a representative component of public views from Roseville of the PRSP area. Therefore, no additional viewpoints need to be identified in response to this part of the comment.

As to the commenter's claim that the photo from Viewpoint 6 has been distorted by the viewpoint's positioning further back from the end of the road or sidewalk, making it inaccurate for views from Roseville, Viewpoint 6 as it is currently located is indeed the most accurate to represent public views in Roseville on Fiddyment Road. Most viewers on Fiddyment Road within Roseville would indeed see suburban visual elements, such as light standards. Only when drivers or pedestrians are at the border of Roseville about to enter the PRSP area would these elements possibly not be within their view because suburban development occurs up to the city limits. A photo from Fiddyment Road without suburban elements would not be representative of the typical motorist or pedestrian view on Fiddyment Road in Roseville toward the PRSP area. Rather, a view with suburban visual elements is most representative of public views of the PRSP area from Fiddyment Road in Roseville. The commenter has not identified any specific viewpoints that should be considered in the Draft EIR; therefore, no additional response needs to be provided.

The commenter asserts that the conclusion that vividness, unity, and intactness are low has "very little explanation" and that the unity and intactness conclusions are based on an "assumption" that the foreground contains urban residential elements. On page 4.1-12, the Draft EIR explains:

Vividness is low because there are no distinct visual patterns or elements. The view has low unity because of the lack of integration of residences into the grazing area and the resulting abrupt transition. The intactness is low because modern residential developments are not a common visual intrusion associated with grazing areas.

Therefore, the conclusion about vividness, unity, and intactness at Viewpoint 6 are supported by explanation. Regarding the assertion that the conclusions are based on an "assumption" about residential elements in the foreground; to clarify, Viewpoint 6 indeed contains encroaching residential elements in the foreground. Relatedly, the commenter states the Draft EIR's conclusion regarding unity and intactness are based on incompatible urban residential elements in the foreground. However, the Draft EIR does not state that the residential developments are incompatible; rather, the Draft EIR states that the residences are not integrated and result in an abrupt transition with the grazing area and that modern residential developments are not a common visual intrusion associated with grazing areas. In addition to the fact that there are residential elements in the foreground, this viewpoint is the most representative of public views of the PRSP area from Fiddyment Road in Roseville, as explained previously. Therefore, no revisions have been made to the Draft EIR in response to this portion of the comment.

The commenter states that city residents who live and travel on the southern boundary of the project area have significant views of the Sierra Nevada. The Draft EIR recognizes visibility of the Sierra Nevada foothills and mountains on page 4.1-2: "[t]he Sierra Nevada foothills and mountains of the Sierra Nevada are visible east of the project area." The Draft EIR also explains why the Sierra Nevada is not a significant visual feature, contrary to the commenter's claim that it is: "[T]he Sierra Nevada is not a dominant feature because of distance and atmospheric haze." Additionally, despite the commenter's claim that future development would block views of the Sierra Nevada, such a conclusion is uncertain and speculative. As previously described, CEQA does not require speculation in evaluating impacts. Heights and locations of buildings that would be constructed within the project area cannot currently be known because there are no development proposals for consideration. Whether a taller building would block a public view is dependent on viewer location, building height, building size, and, in the case of views of the Sierra Nevada, atmospheric haze. Without this information, an analysis of whether development would block the Sierra Nevada would require

speculation. Therefore, no revisions to the Draft EIR have been made to change its conclusion about the significance of this aesthetic impact.

4-36 It is unclear whether the comment is stating that there are many odor complaints within 1 mile of the WRSL or that with a buffer of 1 mile there are in total many odor complaints. To clarify, Exhibit 4.3-1 shows odor notifications attributed to WRSL facilities and reported to WPWMA from 2012 through 2017, and most of the complaints originated more than 1 mile from the WRSL parcels.

The comment suggests that the Draft EIR "more fully" address impacts of the landfill buffer reduction, and the comment mentions exacerbation of odor impacts. See Master Response 4: Odors for a discussion of the Draft EIR analysis of odor impacts and revisions that have been made to the analysis. The comment requests only that more discussion be provided and does not specify what part of the analysis the commenter finds insufficient or what should be added. The County believes that the analysis as described in Master Response 4 is sufficient under CEQA; therefore, no revisions have been made to the Draft EIR regarding the impacts of the landfill buffer reduction.

4-37 The comment raises issues related to the WRSL expansion. See response to comment 4-2.

4-38 The comment states that the Draft EIR concludes that mitigation is infeasible because odor impacts are subjective. Master Response 4: Odors explains that the WPWMA Odor Mitigation has now been made a mitigation measure (Mitigation Measure 4.3-6a); however, the mitigation is still infeasible because the County cannot enforce the creation of a fee program or the implementation of the improvements, as explained in Master Response 4.

4-39 The comment states the Draft EIR does not mention potential impacts to the City of Roseville wetland preserve areas adjacent to the project and that the County should manage open space areas contiguous with City preserves consistent with the City of Roseville Open Space Preserve Overarching Management Plan (August 5, 2011), submit improvement plans to the City of Roseville for their review and comment, install masonry walls or closed fencing adjacent to City preserves, and design drainage systems so they do not discharge to City preserve areas.

The Draft EIR shows the City's preserve areas in Exhibit 4.4-1. The PRSP land use plan includes open space preserve in the southwest corner of the site that would connect to City preserve areas; however, low-density residential land use is also planned in this area. Indirect impacts to off-site wetlands are addressed on the Draft EIR (page 4.4-37). Although, the Draft EIR does not quantify the acreage of off-site wetlands, the Draft EIR acknowledges on page 4.4-45 that vernal pool wetlands within 250 feet of proposed development may be subject to indirect effects unless the immediate watershed can be demonstrated to be smaller than 250 feet. This includes wetlands within the City's preserve areas. Providing the specific wetland acreage would not change the impact conclusions. Also, because the potential impacts would be indirect, even if the specific number of existing vernal pool wetlands were provided, it would not be possible to provide the same level of precision related to the indirect impacts to those wetlands. Rather, the Draft EIR identifies policies that are protective of these areas and identifies mitigation measures to protect these features from indirect impacts.

Several SAP policies and programs are protective of aquatic resources, habitats, and species, including Policy NR-1.1 through NR-1.4, Program NR-4, Policy NR-2.1, Program NR-5, Policy NR-2.3, Policy NR-2.4, Policy NR-2.5, Policy NR-3.1, Policy NR-3.3, Policy NR-3.4, Policy NR-3.5, Policy NR-3.10, Policy NR-4.1, Policy NR-4.2, and Policy NR-4.4, The full text of these policies and programs is provided in the Draft EIR (pages 4.4-31 through 4.4-34). Of these policies and programs, the ones that most specifically address indirect impacts related to construction and operation of the project on vernal pool habitat in City preserves, include SAP Policy NR-2.5, "Setback Area Protection and Maintenance," which requires no development projects to include provisions within setback areas that are designed to protect natural resources, including prohibition of the placement of fill during or after construction, establishment of a buffer area, and protection of vegetation within the buffer during construction. The policy requires long-term covenants for the protection and maintenance of

setback areas. Regarding operational impacts, SAP Policy NR-3.5, "Stream Protection Best Management Practices and Low Impact Development," requires the use of feasible and practical best management practices (BMPs) and LID strategies (strategies that promote natural movement of stormwater through preservation of natural landscape features and minimization of impervious surfaces) to protect streams from the adverse effects of construction activities and urban runoff. The policy further requires that LID strategies, which focus on minimizing adverse effects on water quality and surface water runoff, be incorporated into project design. This would reduce potential impacts related to stormwater outfall within existing City preserve areas.

In addition, mitigation for indirect impacts is offered on page 4.4-47 of the Draft EIR, including: "No project construction shall proceed in areas supporting potential habitat for federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a biological opinion (BO) and incidental take authorization has been issued by USFWS and the project proponent has abided by conditions in the BO, including all conservation and minimization measures." This measure would apply to development that could have potential to affect wetlands in the City's preserve areas.

Therefore, protection measures are already required for wetlands within the City's adjacent preserve areas. No revision to the Draft EIR is needed. However, in response to public comment, the County has added the following policy to the SAP to further protect adjacent wetlands:

- Policy NR-4.5: Construction Management Adjacent to Open Space. To protect biological resources in designated Open Space areas, either within or adjacent to the Sunset Area, the County shall require development activities to limit disturbance during construction to the minimum area necessary for construction and access and will prohibit fill within any preserved waters of the U.S. and habitat for Endangered Species unless permitted by the Agencies. To ensure this protection, the County will require that the following protective measures be taken prior to or during project construction:

  A. Improvement plans that show the boundaries and label the Open Space areas

  B. For projects adjacent to the City of Roseville's Open Space preserve areas, the County shall coordinate with the City of Roseville to ensure protection of preserve areas consistent with the City's Open Space Preserve Overarching Management Plan

  C. Pre-construction meetings for construction occurring adjacent to (within 250 feet) or within Open Space areas to address the presence of the Open Space, the sensitive habitats present, minimization of disturbance to the Open Space, and the requirements for preservation of habitat

  D. Biological monitor to observe construction activities occurring within 250 feet of adjacent Open Space Preserve unless there is clearly not foreseeable impact to Open Space habitats

  E. Permits as needed from the Corps, Service, and the County prior to initiation of grading within the open space areas

  F. Temporary construction fencing will be required prior construction adjacent to or within any Open Space area

  G. Flagging of preserved wetlands adjacent to construction within the Open Space

  H. Stormwater pollution prevention BMPs and a Stormwater Pollution Prevention Plan (SWPPP) to prevent pollutant discharges into the Open Space for any project over one acre in size to control sediment and erosion during construction.

I. Temporary stormwater discharge measures (e.g., discharge points, swales) to properly direct flows and ensure that erosion does not take place at any location along the swale or at the point of discharge to avoid discharge into vernal pools and inundation of oak trees.

J. Use of native grasses in post construction revegetation

K. Trash removal and post construction clean-up

L. Post-construction remediation construction impacts as needed

4-40 The comment requests that measures consistent with Section 5.2 of the *City of Roseville Open Space Preserve Overarching Management Plan* (provided as an attachment) be incorporated to mitigate potential impacts to biological resources in City preserves adjacent to the PRSP area. See response to comment 4-39.

4-41 The comment requests that the County agree with the City that the term "future development" is equivalent to "all SAP and PRSP development" that is reasonably foreseeable, with no exclusions. Page 4.9-22, "Methods and Approach," of the Draft EIR states, "In determining the level of significance, the analysis assumes that the SAP, including the PRSP, and future developments implemented through these planning documents would comply with relevant federal, state and local ordinances and regulations." Therefore, the Hydrology and Water Quality section is consistent with this interpretation.

4-42 The comment states that the EIR does not, but should, evaluate whether the project would create any increase in off-site stormwater flows that would impact areas known as the Gleason's and Amoruso Estates. The comment also states that the flows from the PRSP and net SAP areas would be conveyed through the City's Amoruso and Creekview Specific Plan areas and that additional impacts due to increased peak flows have not been analyzed, particularly before the improvements for these off-site downstream receiving facilities have been constructed. Appendix I for the PRSP, Master Drainage Report, provides a comparison of pre-project to post-project peak flows at the downstream edge of the PRSP property for various design storm event frequencies as required by the Placer County Stormwater Management Manual. As development projects in both the net SAP and PRSP areas are submitted for County review, County staff would require a project-specific final drainage report that would include analysis of the project's impacts to downstream properties including the effects of the proposed improvements and changes in peak flows and patterns per Placer County General Plan Policy 4.E.11. Additionally, Mitigation Measure 4.9-1b (see revisions shown in response to comment 1-4) requires projects in both the net SAP and PRSP areas to provide project-specific retention and detention. Projects would reduce post-project peak flows to less than pre-project peak flows by providing on-site detention. Projects would also be required to retain project-specific volumetric stormwater increases either on-site, or by participating in a regional stormwater retention program, once established. The project-specific final drainage report would be prepared in conformance with the Placer County Land Development Manual and Stormwater Management Manual and would be submitted with each project's improvement plans for review and approval by the County. Therefore, off-site stormwater flows would not result in substantial flooding-related impacts in the off-site areas identified in the comment.

4-43 The comment states that, because stormwater flows from the PRSP area were not contemplated in the City of Roseville's EIR for the Pleasant Grove Retention Facility project, Mitigation Measure 4.9-1b is not sufficient for the PRSP area and that additional environmental review would be needed before the Retention Facility can be constructed. The Draft EIR (page 3-69) states that although the City's proposed volumetric retention basin was evaluated at a program level in an EIR prepared by the City, the SAP/PRSP project would require expansion of the facility beyond its current approved design. This EIR evaluates the potential environmental impacts associated with a larger retention facility. The Draft EIR further states that the City of Roseville, or County/City JPA (or other agreement)

would be the CEQA lead agency for the Pleasant Grove Retention Facility project, and additional CEQA review would be required before the facility could be constructed. Therefore, the Draft EIR appropriately evaluates the potential impacts associated with the Pleasant Grove Retention Facility, and notes that additional CEQA evaluation will likely be necessary for the City of Roseville as lead agency to implement. Acknowledgment of the fair-share development fee is provided under response to comment 4-17. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.

4-44 The comment states that Mitigation Measure 4.9-1b should be revised to acknowledge that fair-share development fees associated with development of the Pleasant Grove Retention Facility should be required. The comment also provides suggested language to be added to Mitigation Measure 4.9-1b. See response to comment 4-43, above, regarding Mitigation Measure 4.9-1b.

4-45 The comment provides a minor correction to a construction timing statement. In response to this comment, the first full paragraph on page 4.9-28 of the Draft EIR is revised as follows:

> The Pleasant Grove Retention Facility would function by diverting water from Pleasant Grove Creek and University Creek into adjacent retention basins during storm events. Stormwater would be retained in these basins until downstream flood events end, after which the stored water would be discharged into Pleasant Grove Creek (CES 2017a). The Lakeview Farms Retention Facility would accept stormwater runoff during high flows and allow infiltration in large, constructed wetlands. The Pleasant Grove Retention Facility is currently proposed as two large basins with a combined capacity of 3,461 acre-feet (CES 2017a). The Lakeview Farms Retention Basin would be a single large basin and would be expanded in phases. The first phase ~~(currently planned for construction in 2018),~~ (expected to begin construction in 2020) would hold 1,080 acre-feet of stormwater. The second phase would expand the facility to hold 2,800 acre-feet of stormwater, which would meet the projected needs of the City of Lincoln at buildout. The third and final phase could expand the facility to hold as much as 4,000 acre-feet of stormwater (CES 2017b). Both facilities would require expansion of their planned retention basins to accommodate future projected municipal flows and flows from the net SAP area. Technical studies prepared for the SAP found that both the Pleasant Grove and Lakeview Farms Retention Basins can be expanded to meet the stormwater retention needs of the SAP (CES 2017a, 2017b). Exhibit 3-23 shows the location of the potential regional stormwater retention facilities. Any changes to the Pleasant Grove or Lakeview Farms Retention Facility would occur only through the review and planning process of the appropriate jurisdictions (City of Roseville for the Pleasant Grove Retention Facility and the City of Lincoln for the Lakeview Farms Retention Facility). (It should be noted that, as part of these review and planning processes, the retention facilities would all be designed and engineered according to applicable federal, state, and city standards, which would minimize potential for failure of a levee wall or other facility that could cause flooding of downstream properties.)

This correction provides minor clarification and does not change the analysis or conclusions of the Draft EIR.

4-46 The comment recommends that the County add a statement to the end of Mitigation Measure 4.9-1a to require public review period comments to be addressed within the final drainage report. Public review period comments are addressed in this Final EIR. No change to mitigation measure language is necessary.

4-47 The comment states that the EIR should be revised to disclose the location of the project area's existing 100-year floodplain in order to fully analyze the potential downstream impacts in the City of Roseville. Further, the comment suggests revisions to SAP Policies PFS-5.6 and NR-3.2 regarding future floodplain mapping. The net SAP area was analyzed at a programmatic level and thus does not contain the level of detail regarding project-specific development needed to determine impacts

to the floodplain. Mitigation Measures 4.9-1a, 4.9-1b, and 4.9-5a -5c address impacts to the floodplain by requiring that a project-specific drainage report be submitted with any improvement plans and that project-specific detention and retention requirements be satisfied. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4.

The PRSP area was analyzed at a project level. A master drainage report was prepared and included as Appendix I. Plate 2 of Appendix I depicts the existing 100-year floodplain. Plates 4 and 5 depict the proposed 100-year floodplain as mitigated and unmitigated, respectively.

The SAP includes areas of the Federal Emergency Management Agency (FEMA) Special Flood Hazard Area Zone A, for which the floodplain elevations are not yet determined. The net SAP area was analyzed at a programmatic level and mitigation measures are included to ensure that future project submittals are analyzed at a project level that address the commenter's concerns. SAP Policy NR-3.2: Floodplain Compliance, states, "The County shall require all development in the FEMA or calculated 100-year floodplain to comply with the provisions of the Placer County Flood Damage Prevention Ordinance." This Ordinance provides for definitions to calculate the limits of the floodplain. The use of "100-year future, fully developed floodplain" requirements in the Pleasant Grove Creek area has largely been modified because of the nature of the watershed being undeveloped prior to development. Project-specific versions of this analysis are generally created and utilized as a significant amount of the detention/attenuation in this watershed occurs naturally. The project does propose to expand the development parameters of future studies to include the developed areas of these projects.

Policy PFS-5.6 was drafted based on past discussions between County and City staff regarding the Pleasant Grove Retention Facility. Utilization of the current 100-year, 8-day storm methodology references a 1998 agreement between Sutter County and the City of Lincoln, but the policy identifies the possibility that a different, agreed-upon methodology could be used. County and City staff recognize that further future discussions are needed between the various jurisdictions in order to determine the appropriate agreed upon methodology referred to in Policy PFS-5.6.

4-48 The comment requests verification that Appendix D of the Draft EIR includes all updated Volumetric Retention Studies. Appendix D includes the following Volumetric Studies: North Canal Tributaries Mitigation – Lakeview Farms at Coon Creek dated September 25, 2017; Placer Ranch Onsite Mitigation dated September 19, 2017 and revised on September 26, 2017; North Canal Tributaries Mitigation – Scilacci Farms at Coon Creek dated September 20, 2017 and revised on September 26, 2017; Pleasant Grove Creek – Regional Volumetric Mitigation dated September 18, 2017 and revised September 26, 2017 and September 29, 2017. These are the correct technical studies.

4-49 The comment states that the Draft EIR conclusion regarding odor-related land use impacts is incorrect because the commenter asserts that payment of fair share fees is a feasible mitigation measure. Master Response 4: Odors explains that the WPWMA Odor Mitigation has now been made a mitigation measure (Mitigation Measure 4.3-6a); however, the mitigation is still infeasible, as explained in Master Response 4. Regarding analysis of potential landfill expansion, see response to comment 4-2.

4-50 The comment states that mitigation measures related to the RPP2 on page 4.11-34 of the Draft EIR do not include specific performance criteria to ensure adequate sound attenuation. The comment further suggests that the mitigation should include additional requirements for the specific plan developers to be responsible for mitigation, for the sound wall to comply with City of Roseville Construction Standards, and that the mitigation measure should be revised to specify Placer County noise standards be achieved.

As discussed in response to comment 4-12, Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR provides specific performance criteria (i.e., Placer County noise standards) to ensure noise levels at future planned receptors would not disturb sensitive land uses or exceed Placer County noise standards. After additional consideration, Mitigation Measure 4.11-4b was revised to remove

the 5-db reduction requirement for the sound wall and rely on the performance criteria of achieving the Placer County noise standards. Mitigation Measure 4.11-4b on page 4.11-36 of the Draft EIR is revised as follows:

Mitigation Measure 4.11-4b: Reduce exposure to new sensitive land uses from the existing Roseville Power Plant 2 (PRSP Area)

- Before approval of small-lot tentative maps, the project proponent shall demonstrate that the building occupants of new residential or other sensitive land use within the PRSP area are not exposed to noise levels from the RPP2 that exceed Placer County land use compatibility standards (e.g., 60 dBA L_{dn}/CNEL for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA L_{eq}/65 dBA L_{max} [night], 55 dBA L_{eq} /70 dBA L_{max} [day]).

- If achievement of the Placer County noise standards cannot be met by providing adequate setback of at least 590 feet from the RPP2 (i.e., distance at which nighttime L_{eq} standard is met), then the County shall require the developer to construct, at developer's costs, a sound wall ~~be constructed~~ between the existing RPP2 and any new sensitive receptors. ~~The sound wall shall be designed by an acoustical engineer and constructed and placed in a manner that achieves, at a minimum, a 5 dB reduction in sound.~~ The wall design shall be coordinated with the City of Roseville. The wall or a combination of wall and setbacks, shall result in achievement of Placer County noise standards.

As discussed on page 4.11-36, the only noise standard that is currently being exceeded at locations where future receptors could be placed is the Placer County nighttime standard of 45 dBA L_{eq}. A reduction of 5-dB would ensure that all Placer County noise standards are achieved. Further, the mitigation specifically identifies the project proponent as the responsible party for implementation of mitigation related to the RPP2. Finally, the project is located within Placer County and mitigation has been incorporated that ensures the noise levels from the existing RPP2 would not exposure future planned receptors within Placer County to noise levels that exceed applicable noise standards. Considering the project is within Placer County and not the City of Roseville, the design of the sound wall would be subject to County approval, not City of Roseville approval. Placer County would ensure that construction of the sound wall meets all requirements set forth by Mitigation Measure 4.11-4b and applicable Placer County code. No changes are necessary.

4-51 The comment states that the City of Roseville is currently providing a disproportionate level of service for calls in Placer County to backfill services in the SAP area and this effect on City of Roseville fire services is not addressed in the Draft EIR. The comment further suggests that the mitigation measures be revised to include performance standards for determining the effectiveness of the mitigation measure and that additional information regarding timing, size and location of fire stations to serve the project. Fire protection services for the net SAP and PRSP areas are provided by Placer County Fire. Placer County has a full-service contract with the California Department of Forestry and Fire Protection to provide fire protection services, including but not limited to structural and wildland fire protection, dispatch services, fire inspections, basic and advanced life support emergency medical services. Placer County Fire also has mutual aid agreements with other jurisdictions and entities including the City of Roseville, and through these agreements, the Placer County Fire Department would be able to receive assistance if needed. The City of Roseville has entered into the Western Placer County Cooperative Fire Services Response Agreement Operational Plan along with other local fire departments and fire districts. This operational plan is designed to provide personnel from each agency a means for executing the Western Placer County Cooperative Fire Service Response Agreement. In addition, this plan outlines procedures and guidelines for the signatory agencies in delivering efficient initial response regardless of jurisdictional boundaries.

Placer County Fire Station 77 is located on Athens Avenue in the SAP area. This station provides first-level fire and emergency response for the project area and is staff with Advanced Life Support

municipal fire protection delivery models. Chapter 3 of the Draft EIR, "Project Description," notes that a new fire station is required to be included in the PRSP area to accommodate increased demand for fire protection services. The timing and triggers for the fire station in the PRSP area and the provision of fire protection and emergency services to the Sac State–Placer Center would be subject to provisions noted in the PRSP Development Agreement. The PRSP notes on page 8-10, if it is determined that an on-site fire station is needed to serve the PRSP area, one can be accommodated on CP parcel PR-71 or on any parcel with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. Mitigation Measure 4-13-1b requires that the specific locations for the fire stations and fire station design be identified and coordinated with the Placer County Fire Department. The fire stations would be constructed as needed to serve development and maintain staffing ratios.

The PRSP area is located entirely within the future annexation area of Placer County's Community Facilities District 2012-1 to fund maintenance and operation of fire and emergency services within SAP. Mitigation Measure 4-13-1a requires the creation of a Community Facilities District, County Service Area Zone or Benefit or annexing into an existing CSA Zone of Benefit or combination thereof for the purposes of funding supplemental revenue for operations, training, maintenance and personnel costs to provide fire protection and emergency response services.

The net SAP area is located within the Placer County Fire Facilities Fee area, and the PRSP area would annex into the fee program to provide a funding mechanism for the construction of fire and emergency service facilities. See response to comment 4-5 regarding timing and performance standards.

4-52 The comment raises a number of issues related to law enforcement impacts and expresses concern that the direct connection between the project area and the City of Roseville would create the impression that law enforcement services would be provided by the City of Roseville. Specific concerns include increased 911 emergency calls routed to the City of Roseville, the need for additional California Department of Highway Patrol (CHP) services, law enforcement staffing, and emergency response times. Responses are provided below for each of these issues.

- 911 calls. As stated in the Draft EIR (page 4.13-20), the police-to-population ratio established by the Placer County General Plan is 1.0 officer per 1,000 population for unincorporated areas. However, for new growth areas, the sheriff's department utilizes a standard of 1.2 officers per 1,000 population as a threshold to determine adequate service. In addition, the Draft EIR analysis assumes maintenance of the current response time: approximately 8 minutes or less for an emergency call. Placer County uses these service standards to determine the additional law enforcement staff and facilities necessary to serve a proposed project. This would include staff and facilities necessary for response to 911 calls within the project area. To determine significant impacts associated with police protection service, the Draft EIR (4.13-19) uses a threshold of significance based on whether the project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services. The increase in demand for police protection would not result in the need to construct expanded or additional stations, such that a substantial adverse effect would result (that has not already been evaluated in this or other EIR). Therefore, no addition analysis is needed.

- CHP demand. The Draft EIR states (page 4.13-28) that although implementing the SAP would increase the number of vehicles on SR 65, the SAP does not propose changes to SR 65 that would increase the service area for the CHP. State service providers, such as CHP, are funded in part by property taxes. Development of the net SAP area would increase property taxes paid to the State of California that could fund an increase in CHP staffing levels. Implementing the SAP would not be anticipated to increase demand for CHP services such that expansion of CHP

offices would be required. Although the commenter suggests that increased traffic associated with the project would result in increased response from Roseville Police Department and Roseville Fire Department for collisions within the city, the comment does not draw a nexus between that increased response and the need for increased demand for CHP. The Draft EIR appropriately evaluates impacts to law enforcement services, including CHP. See discussion above regarding the threshold of significance for police protection services. No revisions are necessary.

- Police staffing. The comment suggests that the Draft EIR indicates that 19 new officers would be required to meet the law enforcement officer-to-population ratio. Using an officer-to-population ratio of 1:1,000, the commenter indicates that, for a project introducing 24,000 new residents, the actual number should be 24 new officers. There are several incorrect statements made in this comment. The Draft EIR (page 4.12-10) indicates that the project would generate 19,314 new residents (not 24,000). It states that the County's officer-to-population ratio is 1:1,000; however, as described above, for new growth areas a standard of 1.2:1,000 is used (Draft EIR page 4.13-20). Using the appropriate service ratio, the Draft EIR (page 4.13-28) identifies the need for 23.2 new officers to support the project (not 19). This is close to the 24 new officers suggested by the comment. Also, as described in the Draft EIR, the Sac State–Placer Center would provide its own law enforcement. The fact that Sac State–Placer Center students may live outside the project area (including within the city) is not different than any other proposed land use which involves employees or visitors that would use a component of a project and live elsewhere. Those services would be paid for via property taxes or other taxes/fees associated with the place of residence. General impacts associated with population growth are evaluated in Section 4.12 of the Draft EIR, "Population, Employment, and Housing," and also in the "Growth Inducement" discussion in Chapter 5, "Other CEQA-Mandated Sections." See response to comment 4-5 for a discussion of mitigation timing. No revision to the Draft EIR is necessary.

- Response times. The comment suggests that the project would result in law enforcement staffing below County standards and that response times would not be maintained. As discussed above, the comment did not correctly interpret the Draft EIR's analysis of law enforcement service ratios. Regarding response times, the Draft EIR states (page 4.13-28) that the Placer County Sheriff's Office currently has sufficient staff to meet existing law enforcement services and currently meets County response time goals (Barnhart, pers. comm., 2017). The Draft EIR further states (page 4.13-28) that as development is constructed, the Placer County Sheriff's Office anticipates redrawing the boundaries for the beats that serve the net SAP area to add more officers and maintain the response time standards for emergency calls (Barnhart, pers. comm., 2017). See discussion above regarding the threshold of significance for police protection services. No revisions to the Draft EIR are necessary.

4-53 The comment expresses concern that project development would increase demand on the City of Roseville's Martha Riley Community Library. This comment is based on the significant number of cardholders who live outside of Roseville. The comment concludes with concern that the lack of commitment from the future university to make its library open to the public and no funding for a library within the project area must be addressed. Comments indicate City of Roseville desires funding for its library system. Page 4.13-18 of the Draft EIR notes that the County requires the collection of Capital Facilities Fee to mitigate impacts caused by new development in the county. The fee revenue is used to maintain per-capita facility standards for facilities such as libraries. Facilities to be funded under the fee program include expansion and construction of libraries. The SAP, including the PRSP, is required to pay this fee to mitigate impacts caused by new development. The Draft EIR (page 4.13-21) identifies SAP Policies PFS 2.2 through 2.4, which provide the direction to collect both capital and operational funding from new development to offset impacts to public services. Also, Mitigation Measure 4.13-4 requires the creation or annexation of development into a Community Facilities District, County Service Area Zone of Benefit, or annexation into an existing zone of benefit for the purpose of funding supplemental revenue for library facilities. Note that the

County has revised Mitigation Measure 4.13-4 to require additional interim library service. See Chapter 2, "Revisions to the Draft EIR," for the revised mitigation measure text.

4-54 The comment expresses concern about Impact 4.13-5 of the Draft EIR. Specific concerns include parkland credit for privately-owned land, residential units in the SAP area, insufficient little league fields and soccer fields, and Roseville parks that were not listed in the Draft EIR. Table 4.13-9 in the Draft EIR summarizes the parks and open space requirements for net SAP area. Requirements are based on an estimated population of 6,095 residents in the net SAP area. As noted on page 4.13-36, "Because the net SAP area has sufficient space and opportunity to comply with Placer County General Plan and SAP policies for provision of sufficient active and passive parkland and would be required to do so, impacts to parks and recreation would be less than significant." Also, the net SAP area has been analyzed at a programmatic level and does not include evaluation of specific recreation facilities such as sports fields. Development projects proposed within the net SAP area are evaluated against General Plan and SAP polices at time of submittal of an application. When the application is submitted in the net SAP area, the proposal would be required to comply with the General Plan and SAP requirements for parkland provision, including provision of specific recreation facilities, such as sports fields. For the PRSP, Table 4.13-10 on page 4.13-36 of the Draft EIR summarizes parks and open space requirements and credits for the PRSP. The PRSP would provide a total of 69.77 active acres of parks. Included within the 69.77 is 7.23 acres of land provided for private recreation facilities. These private recreation areas are given a 50-percent credit in meeting the County's active parkland requirements. The total amount of credited acreage is 66.10 acres which meets the County's General Plan standards.

The Draft EIR includes evaluation of impacts associated with regional parks. As stated on page 4.13-38 of the Draft EIR, future development in the net SAP and PRSP areas would pay in-lieu fees, dedicate parkland, and/or construct parks and recreation facilities in compliance with Placer County requirements and to meet the future SAP demand for parks and recreation facilities. Additionally, park facilities could be constructed in the project area to meet the needs of residential development in the net SAP and PRSP areas, or appropriate in-lieu fees would be paid if on-site recreation requirements are infeasible. In-lieu fees would include fair-share contribution to development of regional parks in the area. No revisions to the Draft EIR are necessary.

4-55 The comment suggests that the Draft EIR must address cumulative impacts to City of Roseville parks. The Draft EIR evaluates cumulative impacts on parks and recreation facilities. Specifically, Cumulative Impact 4.13-13 evaluates the project's potential contribution to cumulative impacts on parks and recreation facilities (including regional park facilities) along with other proposed and approved development in the area. Cumulative Impact 4.13-13 concludes that because the County's active and passive park standards would be met by future development in the project area through construction of park facilities, payment of in-lieu fees, contribution to regional recreation facilities, and dedication of land for parks, implementing the project would not result in a considerable contribution to a cumulative impact on parks and recreation facilities.

4-56 See response to comment 4-4 regarding the extension of Foothills Boulevard.

4-57 The comment expresses concern regarding the inclusion of major roadway projects included in the cumulative traffic analysis and suggests the development of a phasing plan to identify the timing of roadway improvements. The cumulative traffic analysis includes transportation improvements that are documented in the financially constrained project list of SACOG's 2036 MTP/SCS. Therefore, these transportation improvements are considered reasonably foreseeable. The commenter's request for a phasing plan is noted.

4-58 The comment expresses concern about including roadways connecting Fiddyment Road to Blue Oaks Boulevard, and Woodcreek Oaks Boulevard to Blue Oaks Boulevard through residential neighborhoods via Crocker Ranch Road and Parkside Way in the traffic model. The comment suggests that these roadways should be removed from the model because they are minor roadways

traveling through residential areas. Crocker Ranch Road represents the shortest route between Fiddyment Road north of Angus Road and Blue Oaks Boulevard east of Crocker Ranch Road. Despite its lower speed, it is a shorter travel time route than remaining on Blue Oaks Boulevard and Fiddyment Road to travel between the same end points, as demonstrated by Google Maps and GPS navigation. The links representing Crocker Ranch Road and Angus Road are also included in the City of Roseville's traffic forecasting model and have been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville to reflect their function as residential collector streets. It is the function of the traffic forecasting model to recognize that Crocker Ranch Road is the shortest route for trips between these two arterial roadways. There are no physical barriers that prevent vehicles from using Crocker Ranch Road as a route between Fiddyment Road and Blue Oaks Boulevard. Therefore, the traffic forecasting model is accurate in showing both existing and forecasted future trips using it as a likely route between these two arterial roadways.

Similarly, Parkside Way and Northpark Drive are also included in the City of Roseville's traffic forecasting model and have been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville. Although these are local roadways, they along with Opal Drive and Diamond Creek Boulevard have been included in the City of Roseville traffic forecasting model because they function as residential collector streets that collect trips from the residential neighborhoods near Diamond Creek Elementary School and deliver them to arterial roadways, such as Woodcreek Oaks Boulevard, Fiddyment Road, and Blue Oaks Boulevard.

Because these roadways are local residential collectors, the traffic forecasting model codes them accordingly with lower speeds and capacity, generally making them less attractive than higher speed and higher capacity arterial roadways. However, the traffic forecasting model predicts that the addition of project trips to Woodcreek Oaks Boulevard results in substantially over capacity conditions on Woodcreek Oaks Boulevard across the existing two-lane bridge between Tradewinds Drive and Deschutes Drive. Therefore, the forecasting model predicts that some trips would divert to Parkside Way to access Blue Oaks Boulevard, which some trips are likely to use to avoid the overly congested condition on Woodcreek Oaks Boulevard. It is this traffic condition that triggers the need for the Foothills Boulevard extension, as described in Mitigation Measure 4.14-1b.

Therefore, because these roadways serve as collector roadways and have been included in multiple previous traffic analyses for the City of Roseville, they are also appropriate to include in this traffic analysis. They also more accurately forecast the actual routes trips would use when considering travel times between trip origins and destinations and anticipated congestion on major arterial roadways.

4-59 The comment expresses disagreement with the inclusion of certain transportation improvements in the cumulative traffic analyses presented on pages 4.14-94 and 4.14-95 of the Draft EIR. The cumulative traffic analysis includes transportation improvements that are documented in the financially constrained project list of SACOG's 2036 MTP/SCS. Therefore, the County has determined that these transportation projects are reasonably foreseeable. This includes full buildout of the I-80/SR 65 interchange improvements and Placer Parkway Phase 2.

Placer Parkway would be constructed through the PRSP and net SAP areas. Because development in the PRSP and SAP areas would contribute funding to Placer Parkway via the SPRTA fee, the County asserts that Placer Parkway would not have sufficient funding without development of the net SAP and PRSP areas. The cumulative plus project traffic analysis includes Placer Parkway Phase 2 based on future development levels included in this cumulative scenario, and its inclusion in the SACOG 2036 MTP/SCS financially constrained project list.

The widening of Riego Road is based on forecasted development of Sutter Pointe, which is included in the travel forecasting model and reflected in SACOG's 2036 regional projections.

The extension of Blue Oaks Boulevard to Santucci Boulevard is included in the City of Roseville's traffic forecasting model and has been included in the traffic forecasting models for the Amoruso Ranch Specific Plan EIR, the Campus Oaks traffic study, and other recent traffic analyses for the City of Roseville. It is also consistent with buildout of the Roseville General Plan. Therefore, this analysis includes this extension to be consistent with previous traffic analyses completed for the City of Roseville.

4-60 The comment expresses concern with the proposed LOS policy (Policy TM-1.2) in the proposed SAP. The comment also identifies potential inconsistencies in the width and number of lanes on two major roadways (Sunset Boulevard and Campus Park Boulevard) that connect the PRSP area to the City of Roseville's Amoruso Ranch Specific Plan (ARSP) and suggests that these roadways be widened to four lanes to be consistent with the ARSP and reduce demand on Fiddyment Road and Woodcreek Oaks Boulevard. The travel forecasting model used for the Draft EIR analysis included the development of the ARSP and showed that the two lanes proposed for Sunset Boulevard and Campus Park Boulevard are sufficient to serve the forecasted cumulative plus project traffic volumes. Even if these roadways were widened to four lanes, the travel forecasting model showed that traffic demand on Fiddyment Road and Woodcreek Oaks Boulevard would not noticeably change since the roadways already have excess capacity as two-lane roadways. Therefore, it is appropriate for these roadways to remain two lanes as proposed in the PRSP.

Placer County will work with the City of Roseville to ensure an appropriate transition from the proposed roadway cross-sections in the PRSP area to the proposed roadway cross-sections in the ARSP.

4-61 The comment notes that several City of Roseville intersections analyzed as unsignalized intersections were recently (or soon will be) signalized (i.e., between 2018 and 2019). The traffic analysis considers traffic conditions at the time the notice of preparation (NOP) was released in November 2016. At that time, the intersections identified in the comment were not signalized, and therefore are analyzed as stop-controlled intersections. Table 4.14-24 of the Draft EIR shows that the Woodcreek Oaks Boulevard/Crimson Ridge Drive intersection operates at an acceptable LOS with side-street stop-control; therefore, it would operate at an acceptable LOS C or better as a signalized intersection. As noted in Impact 4.14-4, the study acknowledges that signalization of Woodcreek Oaks Boulevard/Painted Desert Drive restores operations to an acceptable LOS.

Mitigation Measure 4.14-4 shows that the proposed project would be responsible for paying impact fees that constitute a fair-share contribution toward the signalization of the Woodcreek Oaks Boulevard/Northpark Drive and Woodcreek Oaks Boulevard/Parkside Drive intersections, as described in the comment.

The signalization of these intersections would increase the percentage of signalized intersections operating at LOS C or better.

4-62 The comment notes that a few of the LOS exceptions identified in Placer County's Dry Creek/West Placer Community Plan were recently annexed into the City of Roseville and should be analyzed using the City of Roseville's LOS policy/standards. Page 16 of Appendix M: Sunset Area Plan and Placer Ranch Specific Plan Transportation Impact Study clarifies that the Baseline Road/Walerga Road/Fiddyment Road and Baseline Road/Watt Avenue intersections are now under the City of Roseville's jurisdiction; and therefore, the traffic impacts at these intersections are based on the City of Roseville's significance criteria (i.e., City of Roseville level of service policy/standards). The comment also identifies Baseline Road – Sutter County Line to Walerga Road/Fiddyment Road. The segment east of Watt Avenue is within the City of Roseville and therefore the operations along this segment are not analyzed according to County standards. The segment west of Watt Avenue remains in the unincorporated County and is evaluated using County standards.

4-63 The comment notes that the City of Roseville General Plan LOS Policy incorrectly omitted a reference to the a.m. peak hour. To correct this omission, Level of Service Policy 1 on page 4.14-29 of the Draft EIR is revised as follows:

- **Level of Service Policy 1**: Maintain a level of service (LOS) "C" standard at a minimum of 70 percent of all signalized intersections and roadway segments in the City during the a.m. and p.m. peak hours. Exceptions to the LOS "C" standard may be considered for intersections where the City finds that the required improvements are unacceptable based on established criteria identified in the implementation measures. In addition, Pedestrian Districts may be exempted from the LOS standard.

4-64 The comment notes that the City's LOS policy applies to both roadway segments and intersections; and that the City relies on its intersection LOS criteria to determine roadway width needs. The comment expresses concern that roadway segment impacts are not identified in the Draft EIR. Consistent with this comment, the Draft EIR analyzes traffic impacts to City of Roseville facilities based on the City's intersection LOS criteria. These criteria and methodology are consistent with the City of Roseville's previously adopted environmental documents, which similarly do not quantitatively analyze roadway segment operations for City of Roseville roadways. However, pages 75-76, 110-112, 180-181, and 220-221 of the Transportation Impact Study (Appendix M of the Draft EIR) describe the project's effect on key roadway segments in the City of Roseville. Based on these effects, the Transportation Impact Study identifies potential roadway widening projects that may be considered to serve the traffic increases generated by the proposed project.

4-65 The comment notes that Impact 4.14-4 in the Draft EIR states that signal warrants are met until the Foothill Boulevard extension is completed, and requests that a signal be installed at Woodcreek Oaks Boulevard/Parkside Way and Woodcreek Oaks Boulevard/Northpark Drive intersections to address near-term impacts. Impact 4.14-4 in the Draft EIR discloses the project impacts to traffic conditions at the Woodcreek Oaks Boulevard/Northpark Drive and Woodcreek Oaks Boulevard/Parkside Way intersections, as described in the comment. Mitigation Measure 4.14-4 commits project proponents to pay impact fees that constitute the project's fair-share contribution toward the installation of traffic signals at these intersections.

4-66 The comment notes that the proposed SAP does not mention Intelligent Transportation Technology/Systems (ITS) within its goals and policies outside of Policy TM-1.11 and suggests that ITS technology be incorporated into the transportation plan. The County will consider ITS in the implementation of the transportation network. This comment raises policy considerations and does not identify issues related to the EIR's analysis or adequacy.

4-67 The comment suggests that the County work with adjoining agencies when updating the commercial truck routes (STAA) to ensure adequate routes are provided to the local freeway system. The County will coordinate with adjoining agencies where commercial truck routes (STAA) cross from the county into adjoining local jurisdictions.

4-68 The comment inaccurately states that Exhibit 4.14-9 in the Draft EIR only shows an increase of 40 new trips on Fiddyment Road between Pleasant Grove Boulevard and Blue Oaks Boulevard. The comment also inaccurately asserts that page 4.14-49 of the Draft EIR states this segment of Fiddyment Road would operate at LOS D, E, or F. Exhibit 4.14-9 shows that Fiddyment Road between Pleasant Grove Boulevard and Blue Oaks Boulevard is forecasted to experience an increase of over 30,000 daily trips. Similarly, page 4.14-49 of the Draft EIR refers to the segment of Fiddyment Road north of the Roseville city limits (and over a mile north of the segment between Pleasant Grove Boulevard and Blue Oaks Boulevard) when identifying roadway segments that would operate at LOS D, E, or F.

4-69 The comment expresses concern that the timeline identified for Phase 1 of Placer Parkway on page 4.14-50 of the Draft EIR is unrealistic. The comment inaccurately states that construction design

documents have not been started to support this claim. The comment also requests that language be added which requires Phase 1 of Placer Parkway be completed before issuing residential building permits for development beyond 25 percent of the PRSP area. Page 4.14-50 of the Draft EIR discloses that the project would have a significant and unavoidable impact in the short-term if more than 25 percent of the PRSP area is developed and Phase I of Placer Parkway is not yet completed and open to traffic. The Draft EIR acknowledges and discloses this impact and also recognizes that this impact would be reduced to less than significant upon completion of Phase I of Placer Parkway, regardless of whether this occurs in 2022 or shortly thereafter. This significant short-term impact does not preclude the County from proceeding with development in the PRSP area. The County is proceeding in the construction design phase of Phase 1 Placer Parkway and anticipates 90 percent construction plans will be completed in fall 2019.

4-70 The comment notes that the Draft EIR states there is a timing gap between when significant impacts to City of Roseville facilities occur and when funds for mitigation will be available. The comment also requests that other feasible mitigation be identified to reduce the impact at the time it occurs. Page 4.14-51 of the Draft EIR acknowledges and discloses that this impact is significant and unavoidable in the short-term until the Foothills Boulevard extension is constructed. The Draft EIR also recognizes that this impact would be reduced to less than significant once the Foothills Boulevard extension is constructed. This significant short-term impact does not preclude the County from proceeding with development in the PRSP area. Additional mitigation beyond what is already identified in the Draft EIR would have a short-term use and become obsolete once Foothills Boulevard is extended. Therefore, additional mitigation is not prudent.

4-71 The comment notes that the Draft EIR does not discuss whether a traffic signal at the Watt Avenue/PFE Road intersection is within the Sacramento County capital improvement program (CIP). This comment inaccurately conveys that the Watt Avenue/PFE Road intersection is in Sacramento County. The Watt Avenue/PFE Road intersection is within Placer County and is included in the Dry Creek Benefit District of the Placer County Countywide CIP, as described on page 4.14-55. The County is collecting traffic impact fees from development in the Dry Creek Benefit District, which will ultimately fund the signalization of this intersection.

4-72 See response to comment 4-3 regarding the percentage of signalized intersections operating at LOS C or better and improvements not identified in the City's CIP.

The comment notes that the SAP includes an LOS policy establishing LOS E as the standard within the SAP and asserts that this is in conflict with the City/County memorandum of understanding (MOU). However, the City/County MOU does not apply to the SAP area.

The comment also expresses concern that the project would accelerate the timing of improvements that are identified in Mitigation Measure 4.14-3 and within the City's CIP. The fair share funding process described in Mitigation Measure 4.14-3 would supplement the City impact fees used to fund improvements within the City's CIP, assuming a fair and reasonable arrangement is reached between the County and City. This additional funding would allow improvements to proceed sooner than if these improvements were solely reliant on City impact fees, and would address the timing issues raised by the comment.

Subsection (a) of comment 4-72 incorrectly infers that the net SAP and PRSP areas are included within the boundaries of an MOU between the City of Roseville and Placer County and that Exhibit C, Roadway LOS development standards described in that MOU are applicable to the net SAP and PRSP areas. The net SAP and PRSP areas are both outside of the boundaries that the MOU covers.

See response to comment 4-22 regarding signal timing optimization. The Draft EIR mitigation analysis considered the additional delay added to lower volume movements and found that the signal timing adjustments result in an overall net benefit to traffic operations at intersections where signal timing optimization is listed as a mitigation measure. This includes their effect on signal

coordination along major corridors, including the Blue Oaks Boulevard, Douglas Boulevard, Pleasant Grove Boulevard, and Roseville Parkway corridors listed in the comment.

The comment expresses concern regarding Mitigation Measure 4.14-3 regarding adding right-turn overlap phases and prohibiting U-turn movements. As described in Impact 4.14-17 of the Draft EIR, the cumulative plus project traffic analysis shows that U-turn prohibitions at most City of Roseville intersections would not be necessary when reasonably foreseeable regional roadway improvements are considered, including the four intersections listed in the comment. The traffic generated by the proposed project would occur over an extended period of time, and the 20-year land use development totals that are included in the EIR's cumulative plus project analysis would occur together with these regional roadway improvements.

The comment also expresses opposition to additional intersection widening at several locations. As described in Mitigation Measure 4.14-17 of the Draft EIR, the additional intersection widening at the three intersections listed in the comment would not be necessary when reasonably foreseeable regional roadway improvements are considered, as shown in the cumulative plus project traffic analysis.

4-73 See response to comment 4-3 regarding fair-share funding for improvements at City of Roseville locations.

The comment expresses concern that Mitigation Measures 4.14-3 and 4.14-4 do not commit the County to specific actions, contain extraneous information regarding a possible formation of a JPA and reciprocity, and do not specify that funds would be held in trust for the City of Roseville for the expressed purpose of improving the specified facilities within the City. In response to this comment, Mitigation Measures 4.14-3 and 4.14-4 on pages 4.14-64 and 4.14-71, respectively, of the Draft EIR are revised as follows:

> Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with ~~just~~ the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. <u>Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City.</u>

4-74 The comment requests that various figures in the SAP be updated to show the Foothills Boulevard extension. As an area plan, the SAP does not identify specific off-site improvements on the figures. No changes to the SAP are necessary.

The comment requests that Exhibit 3-5 of the Draft EIR should be revised to show the Foothills Boulevard extension. However, Exhibit 3-5 shows the SAP land use diagram and for the same reasons described above does not show specific off-site improvements. Off-site improvements are shown in Exhibit 3-24. Also, the comment indicates that the Foothills Boulevard extension is shown in Exhibit 3-24, but not described in the Draft EIR. The Draft EIR includes a description of the Foothills Boulevard extension of page 3-21 and page 3-72.

The comment indicates that Exhibits 4.14-6 and 4.14-7 show the Foothills Boulevard extension as a four-lane roadway instead of the six-lane roadway described in the Draft EIR. Both Exhibit 4.14-6 and 4.14-7 show Foothills Boulevard as a six-lane roadway in the PRSP area and does not show the number of lanes for the off-site extension but shows the extension as a "Future Roadway." The Draft EIR is not internally inconsistent.

Finally, the comment states that figures in the Traffic Impact Study are inconsistent. Fehr & Peers reviewed the figures in the Traffic Impact Study and verified that they are accurate.

4-75 The comment expresses concern that project residents may rely on City of Roseville Transit services, and that the Draft EIR does not evaluate potential impacts to City of Roseville Transit. The project's transit impacts are disclosed in Impact 4.14-13 of the Draft EIR, which acknowledges that the increase in population, employment, students, and attractions would result in an increased demand for transit use. The Draft EIR describes the existing transit service and acknowledges that Roseville Transit provides limited service to the SAP area on page 4.14-22 of the Draft EIR. Therefore, Mitigation Measure 4.14-13a establishes that Roseville Transit will be consulted when the County prepares a transit master plan for the SAP area. Mitigation Measures 4.14-13a and 4.14-13b in the Draft EIR commit Placer County to adequately plan for and fund transit services for the net SAP and PRSP areas. As a member of the Placer County Transportation Planning Agency, the City will be able to participate in the Long Range Transit Master Plan effort referred to in Policy TM-3.1.

The project and this analysis do not commit Roseville Transit to expand service into the net SAP and PRSP areas. Existing ridership numbers show plenty of available capacity on Roseville Transit's fixed route bus lines. Should Roseville Transit decide to expand service into the SAP area, including the PRSP area, the system's available capacity combined with the transit master plan would ensure that the project would not impact Roseville Transit service.

4-76 The comments suggest that the project would reduce the lifespan of the WRSL and that the Draft EIR did not examine impacts on the MRF. The comment recommends mitigation requiring the project to pay its fair share for landfill expansion. Finally, the comment states that the Draft EIR did not examine the full buildout of the SAP on solid waste disposal. This is incorrect. The Draft EIR includes Impact 4.15-6, which evaluates potential impacts from increased demand for solid waste associated with "buildout of the net SAP area and PRSP area. Impact 4.15-6 concludes (page 4.15-57) that:

> after the recycling and diversion requirements for construction waste in the net SAP area and PRSP area are met, a total of 192,695 cubic yards of construction waste would remain, which would be 0.8 percent of the remaining capacity at WRSL. Combined, operation of new uses in the net SAP and PRSP areas would generate 201 tons of solid waste on a daily basis, which would be 36 percent of the available daily permitted processing capacity at the MRF. Annually, buildout of the net SAP area and PRSP area would result in the disposal of an estimated 49,004 cubic yards, which would be 0.2 percent of the remaining capacity at WRSL. Because implementation of the SAP and PRSP would comply with all regulatory requirements that relate to the disposal and recycling of solid waste and because the MRF and WRSL have adequate capacity for disposal of solid waste generated by construction and operation of the SAP and PRSP, this impact would be less than significant.

The commenter provides no evidence that consumption of 0.8 percent of the remaining capacity at WRSL would substantially reduce the lifespan of the landfill. Furthermore, the Draft EIR evaluates

cumulative impacts related to the WRSL and MRF. See Cumulative Impact 4.15-17: Cumulative increase in demand for solid waste services (Draft EIR, page 4.15-69). No revisions to the Draft EIR are necessary.

4-77 The comment suggests that the Draft EIR should be revised to discuss the need for a wastewater metering facility, its location, and impacts. At the time of preparation of the Draft EIR, the need and location for wastewater metering facilities was not known and will not be known until further along in the design process. To include such information at this time would be speculative. The Placer Ranch Sewer System Master Plan (included as Appendix H of the Draft EIR) details the flow meter requirements. Page 37 of the Sewer System Master Plan states:

> In order for the City to account for contributing flows to the treatment plant, flow meters shall be installed at the Placer County/City of Roseville boundary line where the sewer pipe crosses from County to City jurisdiction. There is currently an existing flow meter, known as the Cincinnati meter, located at the southern limit of Cincinnati Avenue. A proposed flow meter shall be located on the Fiddyment Road sewer main to measure flows from PRSP and the SA which are from the County. The City of Roseville will assist with locating the proposed flow meter, along the pipeline alignment.

4-78 The comment suggests that the Draft EIR should be revised to discuss the need for a recycled water metering facility, its location, and impacts. See response to comment 4-77. As described in Chapter 2, "Revisions to the Draft EIR," the May 2017 Placer Ranch Recycled Water Master Plan was included as Appendix G to the Draft EIR; however, a more recent July 2017 version of the document should have been included instead of the May version. The July 2017 Placer Ranch Recycled Water Master Plan, which is included as Appendix B of this Final EIR, states (p. 13) "[t]he transmission pipeline will be designed to fill the tank during either peak or off-peak hours through a [pressure release valve] and metering station located at the Roseville city limit. It should be noted that impacts associated with the metering station are consistent with the overall impacts evaluated for the utilities infrastructure and other development associated with the PRSP and this additional specificity does not change the impacts or conclusions of the Draft EIR.

4-79 The comment suggests that the two 12-inch water mains that would extend from the City of Roseville boundary and connect to proposed 42-inch and 24-inch water mains within the PRSP area be revised to be 24-inch lines. As outlined in the Placer Ranch Potable Water Master Plan, the location of the 12-inch water mains provides the appropriate system looping for reliability. The planned area's maximum day demand is approximately 3 mgd, which can be obtained via two 12-inch mains or a single 18-inch main. As designed, these lines can be extended into the City of Roseville to enhance water system reliability in this area of the City. In addition, a 42-inch regional-serving water line would also be extended into the City of Roseville via the Placer Parkway corridor, consistent with Placer County Water Agency's (PCWA's) master plan. The City of Roseville would have the opportunity to tie into this line from the 24-inch line planned in future Westbrook Boulevard, which provides a viable solution for the City of Roseville to enhance its water infrastructure reliability without requiring 24-inch water lines to be extended from the PRSP area as requested.

4-80 The comments requests that text be added to the recycled water discussion on page 4.15-8 of the Draft EIR. The Draft EIR is revised, but not page 4.15-8, as requested by the commenter. In response to this comment and to provide additional clarity, the second paragraph on page 3-26 of the Draft EIR is revised as follows:

> **SAP Potable and Recycled Water Systems**
> The *Sunset Area Water, Wastewater, and Recycled Water Technical Report* was prepared by Psomas in 2017 to evaluate the wet utilities infrastructure needed to serve buildout of the SAP area. (Note that separate master plans were prepared for the PRSP's potable and recycled water systems.) As indicated in this report (included as Appendix B), the Placer County Water Agency (PCWA) is the water wholesaler and retailer for customers within the

> Sunset Area. The Sunset Area is located within PCWA's lower Zone 6 service area. Recycled water would be provided by PCWA as the retailer with the City of Roseville as the wholesaler providing recycled water from the Dry Creek Wastewater Treatment Plant and Pleasant Grove Wastewater Treatment Plant (PGWWTP). The City of Roseville provides recycled water to customers on a first-come, first-served basis. The City of Roseville would provide the County an opportunity to reserve recycled water supply prior to development under the SAP/PRSP, as considered in the December 2009 South Placer Regional Wastewater Systems Evaluation Final Report. Projected flows and anticipated pipeline diameters and locations are described in detail in the technical study included as Appendix B. Off-site pipeline extensions are identified in Exhibit 3-3 above. The recycled water system would require a reevaluation of the recycled water availability at the time of connection of individual developments. If improvements are needed, they would be funded by those developments.

4-81 The comment requests that text be added to the recycled water discussion on page 4.15-8 of the Draft EIR. The revised text is added to page 3-26 of the Draft EIR as shown in response to comment 4-80, above.

4-82 The comment states that the Draft EIR must explicitly state whether the demand for recycled water is within or exceeds the estimated peak day demand considered in the Systems Evaluation. Recycled water is evaluated in the Draft EIR as a component of Impact 4.15-1, which evaluates potential impacts related to water supply. The Placer Ranch Specific Plan Recycled Water Master Plan, included as Appendix G of the Draft EIR, provides additional detail regarding recycled water and states (page 17) that since recycled water is being supplied by the wholesaler during off-peak periods, existing City of Roseville peak hour recycled water demands should not be affected but that additional coordination with the City of Roseville as well as the execution of a recycled water operations agreement per the Amended and Restated Agreement Regarding the Operation and Use of the South Placer Regional Wastewater Facilities dated October 1, 2012, would be required. Additionally, on-site recycled water storage would be 120 percent of one max day of demands; therefore, it is expected that recycled water would be available from the wholesaler. It should also be noted that the Draft EIR (page 4.15-8) identifies the City of Lincoln as another option for providing recycled water.

4-83 The comment requests a minor clarification to the text in the first paragraph on page 4.15-9 of the Draft EIR regarding SPWA. Consistent with the requested text change, page 4.15-9 of the Draft EIR is revised as follows:

> Wastewater collection facilities are in place to serve existing land uses in the SAP area and are provided through County Service Area (CSA) 28, Zone of Benefit 2A3. CSA Zones of Benefit have been developed in Placer County to own and operate utility systems and to assess customers of separate, specific areas based upon the costs of serving those areas. CSA 28, Zone of Benefit 2A3 was established to provide sewer services to the SAP area. The boundary of CSA 28, Zone of Benefit 2A3 includes all existing developed property in the net SAP area. As new development comes on line, it is required to annex to the CSA Zone of Benefit to connect to existing sewer collection facilities. SPWA partners (Placer County, SPMUD, and the City of Roseville) work together to monitor growth, plan for treatment plant expansions, and ensure that adequate wastewater treatment capacity is available in the SPWA area. Funding for CSA services are provided through property assessments. New development also must pay local and regional connection fees. The local connection fee is collected by the CSA and regional fees are forwarded to the City of Roseville as the contribution by the CSA Zone of Benefit toward payment of the bond debt related to the construction of the regional wastewater facilities (Placer County 2017a:12).

4-84 The comment requests that the text on page 4.15-12 be revised to disclose that the SPWA service boundary would be adjusted to include the entire PRSP and net SAP areas. Page 4.15-12 of the Draft EIR is part of the "Environmental Setting" discussion, which describes the existing physical

conditions of the project site and surroundings. Adding text that does not relate to the existing physical conditions would not be appropriate in this part of the Draft EIR section. The Draft EIR includes Mitigation Measure 4.15-4a, which requires annexation to SPWA's regional service area and PGWWTP's service area. This addresses the concern raised in the comment; therefore, the Draft EIR requires no revision. However, in response to this comment, it should be noted that SAP Policy PFS-4.1 on pages 4.15-33 and 4.15-34 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- **Policy PFS-4.1: Wastewater Management.** The County shall coordinate with the Cities of Lincoln and Roseville to ensure efficient and effective management of wastewater. This includes ensuring that development projects proposed in the Sunset Area have access to sufficient capacity at either the Lincoln Wastewater Treatment and Reclamation Facility or the City of Roseville ~~Pleasant Grove~~ Wastewater Treatment Plants. For projects which exceed the planned wastewater and/or recycled water capacities outlined in the South Placer Wastewater Authority's South Placer Regional Wastewater and Recycled Water Systems Evaluation report, the County shall require project proponents to conduct additional wastewater and/or recycled water analysis and if supply is available projects will need to mitigate impacts identified in the analysis. Mitigation could include contribution to fund future infrastructure system improvements and expansion.

4-85 The comment suggests a minor clarification to the text on page 4.15-25 of the Draft EIR. Consistent with the requested text change, the second full paragraph on page 4.15-25 of the Draft EIR is revised as follows:

> The SPWA is a joint powers authority formed to fund regional wastewater ~~and recycled water~~ facilities in southwestern Placer County for three partner agencies (the "participants"): City of Roseville, SPMUD, and Placer County. The regional facilities funded by the SPWA include trunk sewer lines and two wastewater treatment plants (WWTPs). All three participants transmit wastewater to these WWTPs. SPWA monitors compliance with funding and operational criteria established in the Funding and Operations Agreements among the participants.

4-86 The comment notes an inconsistency between peak wet weather flows (PWWF) identified on pages 4.15-43 and 4.15-45. The Draft EIR (page 4.15-43) reports two different PWWF estimates, but they are not inconsistent. The estimated 11.76 mgd PWWF is the total PWWF resulting from buildout of the net SAP area. The estimated 8.49 mgd PWWF is the amount of flow expected to be conveyed through the PRSP wastewater conveyance system (as opposed to other points of connection). See Table 5 in Draft EIR Appendix B, Sunset Area Water, Wastewater, and Recycled Water Technical Report.

4-87 The comment suggests that the upsizing of a 24-inch to 27-inch sewer line (discussed on page 4.15-46 of the Draft EIR) needs to be added as a mitigation measure. Chapter 3 of the Draft EIR, "Project Description," specifically identifies the potential need to upsize "one 24-inch sewer line to a 27-inch sewer line where two existing 24-inch lines cross under Pleasant Grove Creek" (Draft EIR, page 3-71). Therefore, no changes to the Draft EIR are necessary.

4-88 The comment suggests that the analysis of Impact 4.15-4 be revised to evaluate project flows in addition to buildout flows, not current flows, at the PGWWTP to ensure capacity. In addition to Impact 4.15-4, the Draft EIR includes Cumulative Impact 4.15-15, which evaluates the project's contribution to cumulative increase in demand for wastewater treatment services, including wastewater demand associated with cumulative development projects. See Table 4.15-14 of the Draft EIR, which summarizes the buildout average dry weather flows for the SPWA service boundaries. The Draft EIR requires no revision in response to this comment.

4-89 The comment notes a discrepancy between the flows for the PRSP and SAP areas indicated in Impact 4.15-4 of the Draft EIR and the flows shown on page 19 of Appendix H of the Draft EIR. Appendix H does not include the most recent calculations used in the Draft EIR analysis. The Draft EIR states (p. 4.15-1) several technical memoranda [included as Appendix P of the Draft EIR] were prepared to update the utilities calculations in response to the revised PRSP, including updates to the Potable Water, Recycled Water, and Water Conservation Master Plans; the Sanitary Sewer Master Plan; the Storm Drain Master Plan; and the Dry Utilities Master Plan. The revised calculations in these technical memoranda reflect the revised land use plan and are incorporated into this section of the Draft EIR. The calculations included in Appendix P of the Draft EIR are consistent with the calculations used in the Draft EIR analysis.

4-90 The comment notes a discrepancy between the ADWF for the SAP shown in Table 4.15-10 of the Draft EIR and the ADWF shown in Appendix H of the Draft EIR. This is the same issue identified in comment 4-89. See response to comment 4-89.

4-91 The comment requests changes to text in Appendix G of the Draft EIR to show that recycled water would be provided through the line in Woodcreek Oaks Boulevard, not the North Zone Pump Station. As the appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.

4-92 The comment requests a change in the text of Section 4.3 in Appendix G of the Draft EIR. As this appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.

4-93 The comment requests removal of reference to the North Zone Pump Station in Appendix H of the Draft EIR. As this appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. No revisions to the technical studies are necessary.

4-94 The comment notes a discrepancy in the ADWF for the PRSP area between page 19 of Appendix H and page 3 of the SSMP. The two studies identified by the commenter were prepared for two different plans by two different technical experts. This difference, which is less than 0.2 mgd, between two different plans does not represent a substantial discrepancy. In addition, the estimated "2.17 mgd" identified by the commenter was further refined in the Draft EIR, which states (page 4.15-66), "the Systems Evaluation estimated flows from PRSP area development to be 2.17 mgd ADWF (RMC Water and Environment 2009:3-5 and 3-6). Development in the PRSP area is anticipated to generate an estimated 1.99 mgd ADWF, which is lower than the wastewater flows anticipated by the Systems Evaluation. Presumably, PWWF from PRSP area development would also be lower than assessed in the Systems Evaluation." Therefore, this minor difference between a specific value as reported in two Draft EIR appendices does not affect the analysis of the Draft EIR because the Draft EIR refines the estimate, anyway. No revisions to the Draft EIR are necessary.

Placer County
AIR POLLUTION CONTROL DISTRICT

110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • ww .org

Erik C. White, Air Pollution Control Officer

Letter 5

February 22, 2019

Ms. Shirlee Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

Subject: Review of Draft Environmental Impact Report for the Sunset Area Plan - Placer Ranch Specific Plan

Dear Ms. Herrington:

The Placer County Air Pollution Control District (District) thanks you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Sunset Area Plan (SAP) and Placer Ranch Specific Plan (PRSP) Project. The District has the following comments on the Project's DEIR for your consideration. Our comments focus on two areas of which the District has expertise; air emissions and odor. First we have some recommendations relating to GHG and criteria pollutants. Then, we will address odor impacts.

1. Table 4.7-2 and Table 4.7-3 of the DEIR should be consistent with the modeling results shown in Appendix K. The following tables are from Appendix K summarizing the total unmitigated and mitigated operational Greenhouse Gas (GHG) emissions from the SAP Area and the PRSP Project at full buildout[1]. 5-1

PRSP Operation - Unmitigated

Source	Emissions
Area	7,797
Energy	35,933
Mobile	147,988
Waste	7,109
Water	2,177
Total	**201,004**

SAP Operation - Unmitigated

Source	Emissions
Area	934
Energy	81,219
Mobile	282,392
Waste	10,469
Water	2,926
Total	**377,940**

PRSP Operation - Mitigated

Source	Emissions
Area	5,185
Energy	33,948
Mobile	147,988
Waste	7,109
Water	1,760
Total	**195,990**

SAP Operation - Mitigated

Source	Emissions
Area	26
Energy	46,112
Mobile	282,392
Waste	10,469
Water	2,346
Total	**341,345**

1 Appendix K "Air Quality and Greenhouse Gas Emissions Modeling Results" page 3.

Ms. Shirlee Herrington
February 22, 2019
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The total unmitigated GHG emissions from the SAP Area in Table 4.7-2 should be 377,940 $MTCO_2e$/year and total mitigated GHG emissions from the SAP and PRSP Areas in Table 4.7-3 should be 341,345 and 195,990 $MTCO_2e$/year, respectively. In addition, Mitigation Measure 4.7-2b proposes to pay an offset fee to compensate for the project's GHG emissions in excess of 1,100 $MTCO_2e$/year. Therefore, the correct GHG emission offsets for the SAP and PRSP Project should be 340,245 (341,345 - 1,100 = 340,245) $MTCO_2e$/year and 194,890 (195,990 - 1,100 = 194,890) $MTCO_2e$/year, respectively. Furthermore, notwithstanding the comments below in Item 2, the offset fee should be re-calculated based on the same formula used in Mitigation Measure 4.3-3c for the ROG and NOx Off-site mitigation fee calculation[2].

The followings are suggested corrections for Mitigation Measure 4.7-2b:

> The net SAP area would generate ~~373,896~~ 341,345 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 340,245 $MTCO_2e$/year for a period of one year. Based on the current average rate of $12 per metric ton of CO_2e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal ~~$5,120,190~~ $4,082,940 (equivalent to ~~$0.66~~ $0.55 per square foot for nonresidential and ~~$954~~ $327 per residential unit).
>
> PRSP would generate ~~195,014~~ 195,990 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 $MTCO_2e$/year, or ~~27.14~~ 27.27 $MTCO_2e$/year for each residential unit in the PRSP area. The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal ~~$1,706,730~~ $2,338,680 (equivalent to ~~$955~~ $327 per residential unit).

5-1 cont.

2. Mitigation Measure 4.7-2b proposes the purchase of carbon offsets to mitigate the operational GHG emissions from the SAP and PRSP Areas. The measure also includes a mitigation fee calculation based on the current average rate of $12 $MTCO_2e$. The rate used to calculate the mitigation fee could be underestimated -- according to the EIR's statement "*At the time this EIR was written, the average rate ranges from $8 to $35 per metric ton of CO_2e*." Since the buildout of the SAP and PRSP Project is expected to occur over 80 years or more, the collective mitigation fee paid by the project applicants could not sufficiently satisfy the required GHG emission reduction if the future rate would be more than $12 per metric ton. For this reason, Mitigation Measure 4.7-2b shall identify the required GHG reduction ($MTCO_2e$) for each nonresidential and residential unit instead of a mitigation fee per unit and to require that the project applicant satisfy the emission reduction requirement at the time of recordation of each final map.

5-2

2 Mitigation Measure 4.3-3c determines the off-site mitigation fee based on a total of 7,146 residential units proposed by the PRSP and a total of 7,289,000 square foot non-residential development and 320 residential units proposed by the SAP, DEIR page 4.3-39

Mitigation Measure 4.7-2b should explicitly indicate that the project applicant can satisfy the measure by 1) purchasing sufficient local or California-only carbon credits through the accredited carbon credit registries, 2) investing in a local GHG reduction project/program which complies with the approved protocols from the CAPCOA GHG Rx program or CARB's Cap-and-Trade Offset protocols, or 3) paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the final map. If the mitigation fee is chosen, the District recommends that the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices[3] for GHG allowances at the time of the final map recordation.

5-2 cont.

Mitigation Measure 4.7-2b also requires that the GHG reduction achieved through an offset or through the purchase of carbon credits must meet several criteria. However, the measure does not establish the mechanism to identify and monitor how the purchased carbon credits satisfy the criteria and how the measure should be implemented by the project applicant. The District recommends that the measure include the identification of individuals or agencies responsible for monitoring and verifying when the mitigation measure is implemented.

3. Impact 4.10-2 states that the proposed project includes an amendment to the County General Plan Policy 4.G.11, which would reduce the buffer around the Western Regional Sanitary Landfill (WRSL) from 1 mile (5,280 feet) to 2,000 feet for residential development, or 1,000 feet with the approval of a specific plan, master plan, or development agreement. According to the review of the existing odor complaint data from residents beyond the current 1 mile buffer, the DEIR concludes that the proposed SAP and PRSP Project would have potentially significant impacts on the WRSL.

   The DEIR's Appendix J includes two odor studies from SCS Engineers: *Review of Odor Management at WRSL* (November 9, 2017) and *Evaluation of Incremental Odor Increase from WRSL* (September 27, 2018). The first study reviewed the existing odor complaint data with landfill odor control practices during that time frame, and confirmed that the proposed SAP and PRSP Project would result in additional odor complaints because of the project allowing development within the existing 1-mile buffer zone.

5-3

   The second study conducted a further analysis on the incremental increase in odor emissions and odor impacts that would result from implementation of the SAP and PRSP Project. The report estimated that the incremental odor emissions from the buildout of the proposed SAP and PRSP Project would represent 16 percent of the odor emissions generated at WRSL in 2018 and 8 percent of the odor emissions generated at WRSL in 2058. Additionally, this SCS study also investigated the incremental odor impacts corresponding to the proposed SAP and

3 CARB Cap-and-Trade Program compliance instrument auction information https://www.arb.ca.gov/cc/capandtrade/auction/auction.htm

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PRSP Project. However the results were not explicitly discussed in the DEIR.

The study modeled future odor impacts based on odor emissions, receptor locations to the WRSL, and meteorological conditions taken in June. The results presented as the number of exceedances to a threshold, in dilutions to threshold (DT). The red box drawing on SCS' table shows the locations within the 1-mile buffer zone and the associated number of odor exceedances of 5 DT, 8 DT, and 10 DT. According to the analysis, odor is frequently considered to be offensive when it exceeds 8 DT. The following table4 is from SCS' second study showing modeled odor impacts in 2058 (the time of the WRSL's expected closure) with or without the implementation of the SAP and PRSP Project.

Table 7. Future Odor Impacts

Location	Upscaled Impact in 2058			Upscaled Impact Minus Project			Increase in Exceedance from Project		
	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT	10 DT	8 DT	5 DT
WRSL parking lot	434	566	1059	375	505	938	59	61	121
Closest regional commercial	73	102	178	59	93	164	14	9	14
Mid North boundary of future Sac State	14	40	113	9	28	96	5	12	17
Roundabout at entry to future Sac State	1	7	13	0	3	9	1	4	4
Closest medium density residential	1	1	9	0	1	7	1	0	2
Closest low density residential	0	1	7	0	0	6	0	1	1
William Hughes Park	0	0	5	0	0	4	0	0	1
Leopard Davis Park	0	0	5	0	0	3	0	0	2
Verrasona and Vignolia	0	0	5	0	0	4	0	0	1
Closest high density residential	0	1	4	0	0	4	0	1	0
Greywood Circle	0	0	4	0	0	3	0	0	1
Woodcreek Oaks Safeway	0	0	3	0	0	3	0	0	0
Rainbow Trout	0	0	2	0	0	2	0	0	0
Veterans Park	0	0	2	0	0	2	0	0	0
Settlers Ridge	0	0	2	0	0	2	0	0	0
Dugan Park	0	0	2	0	0	2	0	0	0
Amoruso	0	0	2	0	0	2	0	0	0
Fiddyment Farm Elementary	0	0	2	0	0	2	0	0	0
Mel Hamel Park	0	0	2	0	0	1	0	0	1

5-3 cont.

The red box on above table shows the locations of future development created by the SAP and PRSP Project, within 1-mile buffer zone. According to the number of exceedances under the "Upscaled Impact Minus Project" column, the total number of odor impacts exceeding 8 DT are 193, all which occur in the new SAP and PRSP Areas. The total number of exceedances

4 Appendix J "Evaluation of Incremental Odor Increase from Western Regional Sanitary Landfill" page 31.

for the rest of the locations located outside of the 1-mile buffer zone is 0. This analysis is based on the month of June, which is not a peak month for odor complaints – the majority of odor complaints come in the winter and spring months.

According to the increase from **0** to **193** odor impact exceedances in the month of June in 2058, the SCS study clearly indicate that reducing the 1-mile buffer zone around the WRSL would substantially increase odor impacts with the implementation of the SAP and PRSP Project by placing people in much closer proximity to the WRSL -- even without consideration of any additional project-generated odors and in a month with very low odor complaints based on the current odor complaint history.

Furthermore, it can be reasonably interpreted that the SAP and PRSP Project would be expected to result in a more significant increase in odor impacts during the peak winter and spring months, again because of the project's proposal to reduce the 1-mile buffer zone to the WRSL.

The DEIR points to several studies regarding implementation of on-site odor controls at landfill sites within California to remediate odor complaints. However, the DEIR states that these measures will not be considered because they are beyond the jurisdiction of Placer County. The DEIR's impact discussion acknowledges an increase in future odor complaints created by the SAP and PRSP Project due to land use incompatibility. It goes on to acknowledge that this will place pressure or legal actions on the Western Placer Waste Management Authority (WPWMA) to implement additional odor control and reduction measures at the WRSL. Accordingly, the DEIR proposes to place the burden of mitigating the odor complaints to the public, enforcement agencies (such as the District), WPWMA, and the courts, rather than the project components in order to mitigate the land use incompatibility created by the approval of the SAP and PRSP Project. The odor problem will be exacerbated by new residential development from the SAP and PRSP Project that are closer to the landfill site; development which previously would have been prohibited by the one-mile buffer zone required by the County's General Plan Policy.

5-3 cont.

The DEIR states that one option for the WPWMA may be to increase the solid waste service fee for all service areas (those areas of Placer County west of the city limits of Colfax which includes passing the increased solid waste service fees to the public) to cover future expenditure requirements for odor control and mitigation at the WRSL. These expenditures may include implementing additional odor control measures, paying litigation costs, transporting solid waste to the other landfill sites, such as the Ostrom Road Landfill site located in Yuba County (which has a current public environmental document for a proposal to receive solid waste from the Bay Area), or relocating the WRSL facility to another area. These potential scenarios would likely have very significant economic impact on WRSL

operations, as well as the jurisdictions within Western Placer County, including the cities of Lincoln, Roseville, and Rocklin.

As the DEIR states, the WPWMA is working on its Waste Action Plan to address future WRSL operational needs. The plan will identify operational options and analyze the options based on a variety of factors, including economics and odor impacts. Placer County is a member of the WPWMA's Board of Directors who oversees the operation of the WRSL. The District strongly recommends that the County, as the lead agency under CEQA and a WPWMA Board member, requires the project applicant to commit to working with the WPWMA to develop an odor mitigation plan as a mitigation measure. The potential plan shall identify additional effective and proactive on-site mitigation measures with necessary financial assistance, through the WPWMA Waste Action Plan process, to reduce undesirable odor impacts resulting from the proposed project's land use conflicts. The following are some suggested actions to be included in the proposed plan as mitigation for reducing odor impacts: 5-3 cont.

- Increase the capture efficiency of landfill gas through use of more vertical and horizontal wells and stronger blower fan and trace gas evaluation testing.
- Enhanced cover of landfill areas using tarps, thicker layers of cover, permeable membrane, "Enviro" cover, "Posishell" cover, "closure" turf, compacting soil, and/or "enhanced" material such as vegetation, compost, green waste.
- Improved leachate management.
- Improved compost management using state of the art aeration methods.

The District can work with the County and WPWMA to monitor implementation of the mitigation measures.

4. The DEIR Section 4.13 addresses the potential impacts of the project on public services, including fire protection and emergency services, law enforcement, school, parks and recreation facilities, and library services. The DEIR Impacts 4.3-6 and 4.10-2 all conclude that the proposed SAP and PRSP Project will result in significantly incremental increases of odor emissions and odor impacts to both the existing community as well as to the new development, and a corresponding increase in complaints that the District must investigate and resolve. Thus, this section should discuss the District's role in providing public services and identify mitigation measures for our increased need for resources to deal with odor complaints -- such as direct funding support to offset the costs for these additional services if the proposed project is approved. 5-4

   Although the District is not identified by the DEIR for public service analysis, the District is a

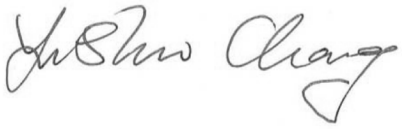
public agency, as defined by California Health and Safety Code[5]. We are responsible for addressing public nuisance, including odors resulting from the discharge of air emissions from any source[6]. As we discuss in the previous comment, the buildout of the SAP and PRSP Project will result in significant incremental increases of odor emissions and odor complaints due to its land use incompatibility. Additional odor complaints received by the District will require resources for investigation, response, and resolution. The District may need to adopt and enforce additional odor control regulations to address the increased number of public complaints regarding odors from the WRSL.

Providing the public with these services, including responding to an increased number of public nuisance complaints over a broader area, odor enforcement activities, and potential litigation for violations, will place a significant financial burden on the District. Without funding support, these costs may be passed on as per capita fees to jurisdictions served by the District, through permit fees upon Placer County businesses, or as fees to be paid by WRSL that will be passed on to the public through increased solid waste service fees. The District is willing to work with the County to identify necessary resources to provide services in responding to an increased number of odor complaints resulting from the buildout of the SAP and PRSP Project.

5-4 cont.

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please feel free to contact me at 530-745-2325 or ychang@placer.ca.gov.

Sincerely,



Yushuo Chang
Planning and Monitoring Section Manager
Placer County Air Pollution Control District

Cc: Erik White, Air Pollution Control Officer
Christiana Darlington, District Counsel
Bruce Springsteen, Compliance and Enforcement Section Manager
Ann Hobbs, Associate Planner

5 California Health and Safety Code §40000
6 California Health and safety Code §41700

Letter 5	Placer County Air Pollution Control District Yushuo Chang, Planning and Monitoring Section Manager February 22, 2019

5-1 The comment correctly identifies a discrepancy between the modeling results presented in Appendix K of the Draft EIR and Tables 4.7-2 and 4.7-3 in Section 4.7 of the Draft EIR. In response to this comment, Table 4.7-2 on page 4.7-19 of the Draft EIR is revised as follows:

Table 4.7-2 Unmitigated Operational Greenhouse Gas Emissions for Net SAP Area and PRSP Area at Full Buildout

Emissions Activity	GHG Emissions ($MTCO_2e$/year)	
	Net SAP Area at Buildout	PRSP Area at Buildout
Hearths and landscape equipment	~~1,512~~ 934	7,797
Electricity consumption	35,107	17,700
Natural gas combustion	46,112	18,233
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,926	2,177
Total operational annual GHG emissions	**~~378,518~~ 377,940**	**201,004**
PCAPCD De Minimis Level	1,100	1,100
PCAPCD Bright-Line Threshold	10,000	10,000

Notes: Totals may not add because of rounding.; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.

Full buildout of the SAP area is expected to occur past 2050, the latest year for which mobile-source emission factors are provided by the EMFAC2014 model.

Source: Modeling conducted by Ascent Environmental in 2018

In response to this comment, Table 4.7-3 on page 4.7-23 of the Draft EIR is revised as follows:

Table 4.7-3 Mitigated Operation-Related Greenhouse Gas Emissions

Emissions Activity	GHG Emissions ($MTCO_2e$)	
	Net SAP Area	PRSP Area
Landscape equipment	~~934~~ 26	5,185
Electricity Consumption	~~32,840~~ 26,555	15,715
Natural gas combustion	~~44,914~~ 46,112	~~17,257~~ 18,233
Vehicle trips	282,392	147,988
Solid waste generation	10,469	7,109
Water consumption and wastewater generation	2,346	1,760
PCAPCD De Minimis Level	1,100 $MTCO_2e$/year	1,100 $MTCO_2e$/year
PCAPCD Bright-Line Threshold	10,000 $MTCO_2e$/year	10,000 $MTCO_2e$/year
Total operational annual GHG emissions	**~~373,895~~ 367,900**	**~~195,014~~ 195,990**

Notes: Totals may not add because of rounding; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent; SAP = Sunset Area Plan; PRSP = Placer Ranch Specific Plan.

Source: Modeling conducted by Ascent Environmental in 2018

This discrepancy also carried into the language for Mitigation Measure 4.7-2b, as pointed out in the comment. The comment provides specific revisions to the mitigation measure text. Comment 5-2 also raises issues with this mitigation measure that require revision; therefore, revisions to Mitigation Measure 4.7-2b are provided in responses to comment 5-2 below.

5-2 The comment acknowledges the long-term buildout of the project and the potential for carbon offset prices to vary drastically over the 80-year period. Rather than provide anticipated cost of carbon offsets, the comment suggests that the amount of greenhouse gas (GHG) emissions that need to be offset is provided in Mitigation Measure 4.7-2b by residential and nonresidential unit rather than a price per unit. This comment also suggests that additional language be added to Mitigation Measure 4.7-2b to identify the entities responsible for monitoring and verifying the purchase of carbon offset credits. In response to the comment, the discrepancies in the amount of mitigated GHG emissions are addressed and Mitigation Measure 4.7-2b on pages 4.7-21 and 4.7-22 of the Draft EIR is revised as follows:

Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area)

The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. This mitigation measure is consistent with guidance recommended by PCAPCD and CARB (PCAPCD 2017:54, CARB 2017:152). This measure is also consistent with the State CEQA Guidelines, which recommend several options for mitigating GHG emissions. State CEQA Guidelines Section 15126.4(C)(3) states that measures to mitigate the significant effects of GHG emissions may include "off-site measures, including offsets that are not otherwise required…."

Project proponents shall implement an off-site GHG emissions reduction program or to pay GHG offset fees to compensate for the project's emissions in excess of 1,100 $MTCO_2e$ for a single year, or as determined feasible by the County and project proponent. The off-site program shall comply with approved protocols from California Air Pollution Control Officers Association's (CAPCOA) GHG Rx program or CARB's Cap & Trade Offset protocols. Alternatively, the project proponent can purchase local or California-only GHG mitigation credits through the CAPCOA GHG Rx program or ARB accredited offset project registry. At the time this EIR was written, the average rate ranges from $8 to $35 per metric ton of CO_2e.

The net SAP area would generate ~~373,896~~ 367,900 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~372,795~~ 366,800 MT CO_2e for a period of one year, or 49.13 $MTCO_2e$/year per thousand square feet of nonresidential development and 27.27 $MTCO_2e$/year for each residential unit in the net SAP area. ~~Based on the current average rate of $12 per metric ton of CO_2e, the estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal $5,120,190 (equivalent to $0.66 per square foot for nonresidential and $954 per residential unit).~~

PRSP would generate ~~195,014~~ 195,990 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be ~~193,914~~ 194,890 $MTCO_2e$, or ~~27.14~~ 27.27 $MTCO_2e$/year for each residential unit in the PRSP area. ~~The estimated payment to offset GHG emissions in excess of thresholds, for a period of one year, would equal $1,706,730 (equivalent to $955 per residential unit).~~ Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K.

This condition shall be satisfied prior to the recordation of each Small Lot Final Map or building permit issuance when a small lot map is not required.

PCAPCD and CARB also recommend that lead agencies prioritize direct investments in GHG emission reductions near the project site to provide potential local air quality and economic co-benefits. ~~For example, mPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable~~

~~energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting."~~

Other examples of local direct investments include financing installation of regional electric vehicle–charging stations, paying for electrification of public school buses, and investing in local urban forests. However, it is critical that any such investments in actions to reduce GHG emissions are real and quantifiable, as determined by the County, PCAPCD, or a consultant selected by the County.

Where development of a local offset is not feasible, the County will allow project proponents to mitigate GHG emissions through the purchase of ~~local or California only~~ carbon credits issued through the CAPCOA GHG Rx program or CARB-accredited offset project registry. The purchase of carbon credits shall be prioritized in the following manner: offsite within the SVAB portion of Placer County, within Placer County, or within California.

The GHG reductions achieved through an offset or through the purchase of a carbon credit must meet the following criteria:

- **Real**—They represent reductions actually achieved (not based on maximum permit levels).
- **Additional/surplus**—They are not already planned or required by regulation or policy (i.e., not double counted).
- **Quantifiable**—They are readily accounted for through process information and other reliable data.
- **Enforceable**—They are acquired through legally binding commitments/agreements.
- **Validated**—They are verified through the accurate means by a reliable third party.
- **Permanent**—They will remain as GHG reductions in perpetuity.

The project applicant can satisfy the requirements of this measure by purchasing sufficient carbon credits through the accredited carbon credit registries, investing in a local GHG reduction project/program which complies with the approved protocol from the CAPCOA GHG Rx program or CARB's Cap-and-Trade offset protocols, or paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the final map or approval of the first building permit when a small lot map is not required. Demonstration of compliance shall be provided to the Placer County Planning Division and carbon offset purchases should be verified by a third party. If the mitigation fee is chosen, the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices for GHG allowances at the time of the final map recordation or building permit issues when a small lot map is not required.

~~Establishment of offsets or purchases of carbon credits to offset operational-generated GHG emissions should be made prior to recordation of each small lot final map, or approval of the first building permit when a small lot map is not required.~~

5-3 The comment raises issues with the Draft EIR's presentation of odor study results, the characterization of effects related to adjusting the landfill buffer, and application of mitigation measures. See Master Response 4: Odors regarding discussion of odor impacts in the Draft EIR.

5-4 The comment suggests that PCAPCD is a public service and should have been included in the Draft EIR's evaluation of impacts on public services. See Master Response 4: Odors regarding potential economic impacts on PCAPCD resulting from the proposed project.

COUNTY OF Placer

County of Placer
Fish and Game Commission
11477 E Avenue ▪ Auburn, CA 95603 ▪ (530) 889-7372

District 1 – Don Gould
District 2 – Mark Fowler
District 3 – Jim Victorine
District 4 – Gary Flanagan
District 5 – Kari Freidig
District 5 – Mickey Daniels
District 5 – Scott Husmann

Letter 6

Shirlee Herrington
Placer County Planning Services Division
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report Comments

Dear Ms. Herrington:

On June 27, 2018, the Fish and Game Commission received an informational report and overview by Crystal Jacobsen, Placer County Principal Planner, regarding the Sunset Area Plan and Placer Ranch Specific Plan. The Commissioners also reviewed the DEIR for the project.

Upon review and discussion of the impacts and proposed mitigation measures for waters, aquatic life, fish, plants and wildlife, along with the immensity and scope of the project, it is clear that there will be potentially significant adverse effects and impacts to the environment and to these resources in the development area. Some adverse impacts were listed as not only "significant", but also "unavoidable". Our natural resources, plants, fish, wildlife and their habitat are not the winners in this proposed project.

Therefore, during the January 23, 2019, Fish & Game Commission meeting the Commission voted unanimously (5 in favor, 1 recusal, 1 absent) to recommend that the Board of Supervisors adopt "Alternative 3" of the draft environmental impact report for the Sunset Area Plan and Placer Ranch Specific Plan. This alternative includes a reduced footprint and reduced land development for the designated area. Our recommendation *increases* total acres in preserves to 3,600 and *reduces* the total area subject to development compared to the current proposed project.

We believe that the modifications included in Alternative 3 are in the best interest of the native plants, aquatic life, water systems, fish and wildlife of Placer County.

6-1

Sincerely,

Mickey Daniels, Vice Chair
Placer County Fish & Game Commission

cc: Bonnie Gore, Supervisor, District 1
Robert Weygandt, Supervisor District 2
Kirk Uhler, Supervisor, District 4
Jennifer Montgomery, Supervisor, District 5
Todd Leopold, County Executive Officer

COUNTY OF PLACER STATE OF CALIFORNIA

Letter 6	Placer County Fish and Game Commission Mickey Daniels, Vice Chair No date

6-1 The comment recommends that the Placer County Board of Supervisors adopt Alternative 3. As described in Section 6.5, "Environmentally Superior Alternative," of the Draft EIR, besides the No-Project–1997 SIA Plan Alternative, Alternative 3 is considered environmentally superior because it results in the greatest reduction of impacts, and it appears to meet most of the project objectives.

The comment is directed toward the project approval process and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

PCWA
water • energy • stewardship

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Einar Maisch, General Manager
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144 Ferguson Road
MAIL
P.O. Box 6570
Auburn, CA 95604
PHONE
(530) 823-4850
(800) 464-0030
WWW.PCWA.NET

Letter 7

January 31, 2019

Ms. Shirlee I. Herrington
Placer County Planning Services Division
3091 County Center Drive, Suite #190
Auburn, CA 95603

RE: Sunset Area Plan / Placer Ranch Specific Plan (PLN16-00341), Draft Environmental Impact Report Released for Public Review and Comment (February 22, 2019)

Dear Ms. Herrington:

In review of the subject documents, PCWA offers the following comments and may provide additional comments in the future as necessary:

Comments on the following sections of the draft EIR
03-Project Description

1. Per a meeting held on September 10, 2018, County staff agreed to include in this EIR the 42-inch pipeline from highway 65 to the eastern boundary of Placer Ranch. It appears that this document excludes pipelines outside of the Placer Ranch Specific Plan (PRSP). Exhibit 3-3, 3-19, 3-24 and page 3-66 does not incorporate the pipeline within this document. (Michele will talk with Ascent about how this was or was not incorporated). 7-1
2. Exhibit 3-3 shows PCWA Pipeline Alignment within Placer Parkway; however, the pipeline will be a transmission main through PRSP, as shown in Exhibit 3-19. The 42-inch pipeline should be included within this EIR, currently areas east of PRSP appear to not be included. 7-2
3. Exhibit 3-19 should show Sunset Area Point of Connection (POC) at west area, label all PCWA connections as POCs, not interties. Also should show offsite treated water pipeline extension to highway 65 and included in this EIR. 7-3
4. Page 3-26 and Exhibit 3-3 should show offsite recycled water pipeline extension and included in this EIR. 7-4
5. This project is building a pressure reducing station at Campus Park Boulevard and Foothills Boulevard. This site should also include a possible future pump station. Please include discussion of a parcel for this infrastructure and modify language to get project level clearance for CEQA moving forward. This site would be granted to PCWA in fee. Criteria was discussed for this parcel and requirements were given at a meeting between PCWA and County staff on September 10, 2018. 7-5
6. There is no agreement in place for PCWA being the recycled water purveyor. Although anticipated, please revise areas where PCWA is listed as the recycled water purveyor. Page 3-53 list "The City of Roseville provides wholesale recycled water to PCWA, which would serve as the recycle water retailer for the PRSP area". PCWA does not retail recycled water yet, PCWA's 2015 UWMP does anticipate serving recycled water within this area. 7-6

4.15 Utilities

1. Potable Water Master Plan and Recycled Water Master Plan, Appendix F and G respectively, have date May 2017; however, the report and PCWA approved documents are July 18, 2017. 7-7
2. Provide a figure or narrative delineating the separation of the utilities within the roadway; ensuring Title 22 requirements are met. 7-8
3. 4.15-4 PCWA has deferred the first phase of the Ophir WTP past 2019. Suggest rewording sentence to "The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. Plans to begin construction on the first phase of the Ophir WTP and associated conveyance pipelines, would provide treatment capacity of 10 mgd." Note, the design and permitting have been completed and construction will begin upon anticipated demand. 7-9
4. Page 4.15-19 Water Conservation: SB 606 and AB 1668 have been passed since the completion of the water master plans. These conservation measures authorize further water efficiency measures beyond SB x7-7, moving away from a comprehensive GPCD target. Even though water efficiency standards have not been fully established, this project should address how the new measures apply. 7-10
5. General: Policy 4.C.1. Per the Potable Water Master Plan, It is the intent of [the project] that two groundwater wells at either Parcels PR-93, PR-96 PR-97 would each have a projected capacity of 1.0 MGD, or approximately 695 GPM, and groundwater is of such quality that only disinfection will be required to meet California Drinking Water Quality Standards. If the available capacity or water quality does not achieve these objectives, the Developer shall, at its on costs, work with PCWA to relocate the well site within the Project to an alternate mutually agreeable site until these objectives are satisfied. Furthermore, the developer shall conduct groundwater study on the sub-basin's water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill. Policy 4.C.1 partially addresses the comment, but more is needed, including, but not limited to: cost bore, other sites, if necessary, etc. 7-11
6. PR-97, parcel for the recycled water tank, pump station and well, went from 2.14 acres to 1.09 acres in the revised land use plan; however, no site plan was submitted to the Agency for approval. A site plan shall be submitted to confirm adequacy of property. With screening requirements of the infrastructure, the existing site may not be adequate. For tank and pump station locations, suggest screening to occur offsite where feasible – adjacent to park or open space areas. 7-12
7. Update the existing water distribution map (Exhibit 4.15-1) with current infrastructure. This infrastructure appears to be approximately 3 years old and several distribution mains appear to be not represented within this map. Distribution maps can be obtained by contacting brickards@pcwa.net 7-13
8. 4.15-40, "The Foothill WTP and Sunset WTP have approximately 1.8 mgd of capacity (as of January 2019) remaining" This document states 2.5 mgd, which is approximately 2 years old. 7-14
9. 4.15-40, Note that the 5.16 MG potable water storage tank will be co-located with a pump station and a lay-down yard for supplies. 7-15

In addition to the review of the draft EIR, PCWA offers the following edits of the Sunset Area Plan and the Placer Ranch Specific Plan. These comments have been carried over from previous Specific Plan comments that were provided as a PDF markup that were not addressed.

Placer Ranch Specific Plan Comments:

1. The treated water tank site should mention a pump station, an adjacent building, and lay down area for storage of parts and equipment. 7-16
2. PCWA should be listed as the potable water purveyor for the region with specific reference to PCWA's Standards regarding water supply, storage, and distribution system infrastructure. Design standards for recycled water should be per the recycled water purveyor. 7-17

- Specific Plan Section 9 Utilities
  - Page 09-2
    - Add "of acceptable water quality" to the requirements of the wells within the Water Supply & Demand paragraph
    - Add "corridor, PR-87" after "via the Placer Parkway" in bottom-right paragraph and delete "roadway corridors"
  - Page 09-4
    - Reword the recycled water retailer to "PCWA or Placer County" in bottom-right paragraph. Improvements are to be constructed to retailer's standard
    - Wells are to be constructed to PCWA's standard, not Placer County.
    - PCWA is misspelled in second paragraph

- Specific Plan Section 10 Implementation
  - Page 10-6
    - Revise entry of Maintenance Funding under Water Infrastructure row in Table 10-1 from "User Fees" to "PCWA fee"; also, add Table 10-1 to Table of Contents. See next comment.
    - Add Placer County Water Agency as a potential recycled water provider, current listing shows Placer County. Maintenance Funding of water and recycled water infrastructure should be the same.
  - Page 10-7
    - Clarification on Public Agency Impact Fees paragraph: PCWA is not part of the building permit process and permits can be pulled without connection charges assessed. PCWA does require a developer to enter into a Facility Agreement for funding and installation of facilities which can happen after issuance of a building permit 7-18
    - Other maintenance funding options listed in Table 10-1 should be described in maintenance funding options description (e.g., User Fee and Property Tax)

- Development Standards Section 5 Public Facilities
  - Page 05-4
    - General Notes
      - If the available capacity or water quality of the groundwater does not achieve PCWA standards, the developer shall work with PCWA to relocate well site within Project to an alternate mutually agreeable site such that objectives are satisfied.
      - Developer shall conduct groundwater study on the sub-basin's water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill
    - Replace "Placer County standards" with "all applicable codes" in the first requirement of Potable Water Facilities
    - Revise second requirement to say "Placer County Code, Division of Drinking Water, and PCWA requirements"

        - Revise fourth requirement to say "Groundwater wells, the PRV station at Foothills and Campus Park, and pumping stations…"
    - Page 05-5
        - Standards that apply to the water infrastructure solely is on the purveyor. For treated water it will be PCWA, for recycled water the document should allow for PCWA or Placer County – keeping the language general may be best.

- Design Guidelines Section 2 Landscape Architecture
    - Page 02-10
        - In general, pipelines should be within paved areas. Where select pipelines are within landscape corridors, trees and shrubs shall be prohibited within 10 feet of any water main

7-18 cont.

Sunset Area Plan Comments:

- Part II Section 9 Implementation
    - 9-5 Infrastructure Finance #5
        - Note that portions of the Sunset Area is within the City of Lincoln's Sphere of Influence (specifically the Urban Reserve). Lincoln is a retailer for all areas within the City's boundary and responsible for collecting connection charges.

If you have any questions or require additional information, please contact Brian Rickards at (530) 823-4845.

Sincerely,

Anthony L. Firenzi, P.E.
Deputy Director of Technical Services

TF:BR:sw

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Letter 7	Placer County Water Agency Anthony L. Firenzi, P.E., Deputy Director of Technical Services January 31, 2019

7-1 The comment indicates that the PCWA water line is not mentioned in the Draft EIR once it leaves the Placer Parkway right-of-way. As noted in comment 8-1, page 3-66 of the Draft EIR states, "Water and Wastewater Infrastructure outside the PRSP Area," first bullet point. This section describes the Placer Parkway water lines as included in the definition of "other supporting infrastructure." Exhibit 3-3 of the Draft EIR clearly shows the PCWA pipeline alignment, including the segment between SR 65 to the eastern boundary of the PRSP area. (Note: See revised Exhibit 3-3 in Chapter 2, "Revisions to the Draft EIR," which shows the corrected PCWA pipeline alignment within the PRSP area.) The Draft EIR (page 3-53) explains how the PRSP water distribution system would intertie with PCWA's transmission and distribution system:

> along the eastern edge of the plan area at Placer Parkway, Sunset Boulevard, and Nichols Road and would interconnect with the SAP potable water distribution system. The primary transmission backbone would be a 42/36-inch transmission main that would extend from the Placer Parkway tie-in to the western edge of the plan area via the Placer Parkway and Campus Park Boulevard roadway corridors. This would include a linkage to the proposed water storage tank. In addition to delivering water to the PRSP area, the transmission pipeline would also serve portions of the SAP area outside the PRSP area.

The Draft EIR provides further detail regarding the PCWA pipelines on page 3-66 indicating that the three 24-inch water lines would connect together west of the Whitney Ranch interchange into a 42-inch water line. This 42-inch water line would continue west for approximately 5,000 feet from the interchange within the Placer Parkway alignment to the eastern boundary of the PRSP area. This project infrastructure would be installed by PCWA as part of the PCWA Ophir Phase 1 and Phase 2 Infrastructure Project. The 42-inch line in Placer Parkway would become a 30-inch line west of the water tank proposed for the PRSP area. The Draft EIR (page 3-66) indicates that the water lines in Placer Parkway and the SR 65/Whitney Ranch Parkway interchange have already been approved with a certified EIR.

The Draft EIR (page 4-6) describes the organization of the impact analysis noting that each impact discussion is divided into the following subsections and includes a separate CEQA conclusions for each: the net SAP area, PRSP area, and other supporting infrastructure. The Placer Parkway water line falls under other supporting infrastructure as it is defined. Therefore, the conclusions for other supporting infrastructure include the Placer Parkway water by reference/definition of the other supporting infrastructure.

7-2 The comment states that Draft EIR Exhibit 3-3 does not correctly reflect the planned location of PCWA's 42-inch pipeline and that portions of the pipeline east of the PRSP area are not included. See revised Exhibit 3-3 in Chapter 2, "Revisions to the Draft EIR," which shows the corrected PCWA pipeline alignment within the PRSP area.

7-3 The comment requests that Draft EIR Exhibit 3-19 be updated to show the Sunset Area Point of Connection (POC) at the west area and that all PCWA connections be labeled as POCs, not interties. See revised Exhibit 3-19 in Chapter 2, "Revisions to the Draft EIR."

7-4 The comment states that Draft EIR page 3-26 and Exhibit 3-3 should be revised to show offsite recycled water pipelines. Page 3-26 of the Draft EIR describes improvements within the SAP area, not off-site improvements. Improvements located outside of the project area are discussed on page 3-71. These include a description of recycled water pipelines. Also, Exhibit 3-3 shows PRSP-related infrastructure outside the PRSP area but within the SAP area (shown in green on the exhibit). Exhibit 3-3 also shows other supporting infrastructure evaluated in the EIR, which includes improvements

outside of the SAP boundary. Except for the PCWA pipeline alignment, Exhibit 3-3 is not intended to show specific types of pipelines and other improvements, but rather shows the areas where those improvements would be installed in order to inform the environmental analyses. Adding the recycled water pipelines to this graphic would result in the need to identify other specific types of infrastructure, which would require a level of detail that would not be supported by this graphic and would not help inform the environmental analysis of the Draft EIR. No revisions to the Draft EIR are necessary.

7-5 The comment seeks identification of pressure reducing station. Exhibit 3-19 in the Draft EIR shows proposed locations for PRV/PSV Stations, which are further detailed in the Placer Ranch Potable Water Master Plan. These stations will also be noted on the Large Lot Final Map for the PRSP.

7-6 The comment states that there is no agreement in place for PCWA to be the recycled water purveyor for the project, and that PCWA does not anticipate serving recycled water within the PRSP area, per PCWA's 2015 UWMP. In response to this comment, the ninth paragraph on page 3-53 of the Draft EIR is revised as follows:

> The City of Roseville provides wholesale recycled water to PCWA, which ~~would~~ is anticipated to serve as the recycled water retailer for the PRSP area pending further discussion and agreement with the County. All recycled water improvements would be constructed consistent with PCWA and Placer County standards or City of Roseville standards for those lines located in the City of Roseville. Construction of PRSP recycled water infrastructure would be phased as needed to support development, with specific timing and funding obligations detailed in the *Placer Ranch Development Agreement*. Detailed information about the PRSP recycled water facilities and supplies, including technical analysis, is contained in the *Placer Ranch Recycled Water Master Plan* (Appendix G).

7-7 The commenter points out that the dates of the Potable Water Master Plan and Recycled Water Master Plan included as appendices to the Draft EIR are not consistent with later versions. As discussed in Chapter 2, "Revisions to the Draft EIR," May 2017 versions of several utilities master plans were included as appendices rather than the more current July 2017 versions. The July 2017 versions are included as Appendices A, B, and C of this Final EIR.

7-8 The comment requests a figure or narrative be added to the Draft EIR delineating the separation of utilities within roadways ensuring Title 22 requirements are met. The project is required to meet all local, state, and federal codes, including California Title 22 health and safety code. The Draft EIR does not need to provide details regarding how, specifically, the project would meet the code requirements. No revision to the Draft EIR is required.

7-9 The comment suggests a minor correction to the third paragraph on page 4.15-4 of the Draft EIR related to the timing of the Ophir water treatment plant (WTP). Consistent with the requested text change, page 4.15-4 of the Draft EIR is revised as follows:

> The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. ~~PCWA also plans to begin construction in 2018 on~~ tThe first phase of the Ophir WTP and associated conveyance pipeline~~s, which are currently under design and~~ would provide treatment capacity of 10 mgd. The Ophir WTP would be constructed in three phases, for a total treatment capacity of 30 mgd (PCWA 2016a:3–4,39).

7-10 The comment suggests changes to the text regarding recently passed water conservation legislation. Specifically, the comment request that AB 1668 and SB 606 be discussed in the Draft EIR. SB 606 and AB 1668 establish guidelines for efficient water use and a framework for the implementation and oversight of the new standards, which must be in place by 2022. The two bills strengthen the state's water resiliency in the face of future droughts with provisions that include:

- Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers; comprised of indoor residential water use, outdoor residential water use, commercial, industrial and institutional (CII) irrigation with dedicated meters, water loss, and other unique local uses.

- Providing incentives for water suppliers to recycle water.

- Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and provide recommendations for drought planning.

- Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

These new regulations, which were passed in the legislature after the NOP was released, will apply to water suppliers and retailers and require long-term planning and efficiency standards. It is too early to understand, specifically, how (or if) these regulations might affect development in the project area; therefore, no revisions to the Draft EIR are provided. Also, the SAP and PRSP already include water efficiency measures that would be required for future development, and the County's WELO further enhances water efficiency.

7-11 The comment notes that General Plan Policy 4.C.1 does not go far enough to address issues related to water quality associated with proposed on-site wells. In response to this comment and to require additional water quality testing to ensure safety, SAP Policy PFS-3.1 on page 4.15-33 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- **Policy PFS-3.1: Water Supply Certification.** The County shall require applicants for new development approval to demonstrate the availability of a long-term, reliable surface water supply for all urban uses as well as recycled water, where available, as an optional water supply. The County shall require written certification from the water service provider that a long-term water supply is or will be available for the new development prior to occupancy. <u>The County will also require any proposed on-site wells used for potable water to be evaluated to ensure the groundwater meets California Drinking Water Standards and, if not, that the well is either appropriately relocated (at the applicant's expense) or any necessary water treatment processes and monitoring systems are installed and operating.</u>

The comment does not identify any issues with the analysis or adequacy of the Draft EIR. Other than the SAP policy edit identified above, which supplements General Plan Policy 4.C.1, no further revisions to the Draft EIR are required.

7-12 The comment notes that parcel PR-97 identified as the location for the recycled water tank changed in size from 2.14 acres to 1.09 acres in the revised land use plan. The comment states that no site plan for the smaller site was submitted to PCWA and that the existing site may not be adequate. The comment also suggests that screening of tanks and pump stations should occur off-site, where feasible. The Draft EIR did include an exhibit in the Placer Ranch Recycled Water Master Plan (Appendix G of the Draft EIR, Figure 4-2) that showed a recycled water tank facility could fit on 0.92 acre. Even though the parcel at the time of the study was 2.14 acres, it only utilized 0.92 acre for the tank and infrastructure. Screening of tanks and pump stations could also occur off-site on adjacent Open Space areas if necessary. Further, the County coordinated with PCWA regarding a site plan and design details for the updated PR-97 site. No changes to the Draft EIR are required.

7-13 The comment suggests updating Draft EIR Exhibit 4.15-1 to reflect current infrastructure. The Draft EIR used current information available at the time to establish the baseline. Minor updates in the infrastructure data do not require changes in the analysis or conclusions of the Draft EIR.

Additionally, the SAP is analyzed at a program level in the Draft EIR, and future projects will be required to study and show the most up-to-date infrastructure at that time.

7-14 The comment suggests a change to the text on page 4.15-40 of the Draft EIR regarding available capacity at the Foothill WTP and Sunset WTP. The comment provides a 2019 capacity update for the Foothill WTP and Sunset WTP. The Draft EIR provided the capacity as it was reported by PCWA in 2017, which was after release of the NOP (November 2016). This updated capacity estimate would not change the conclusions of the Draft EIR; therefore, no revisions are necessary.

7-15 The comment suggests a clarification to the text on page 4.15-40 of the Draft EIR regarding the potable water storage tank. Similar to the discussion in response to comment 7-12, the Draft EIR's evaluation of the recycled water tank was not based on a detailed, parcel-level site plan of the tank site. However, in response to the comment, the following additional minor details are added to page 4.15-40 of the Draft EIR:

> As shown in Exhibit 4.15-4, PCWA transmission main pipelines would be extended through the PRSP area. The water distribution system in the PRSP area would consist of looping pipelines that form a transmission main grid consisting of 12-inch to 42-inch-diameter mains. The pipelines would be installed within collector and arterial roadway corridors. The system would include a 5.16-million-gallon potable water storage tank (co-located with a pump station and supply lay-down area) in the northwestern portion of the PRSP area, near Placer Parkway. Prior to construction of the water storage tank, site-specific geotechnical analysis would be prepared to confirm site suitability for the storage tank. The key components of the proposed potable water infrastructure system are shown in Exhibit 4.15-4. Note that the PCWA water transmission pipeline that would be installed in the Placer Parkway right-of-way is not identified in Exhibit 4.14-4. Please refer to Exhibit 3-3 for the location of the PCWA pipeline in Placer Parkway.

7-16 The comment seeks amendments to the PRSP. No changes to the Draft EIR are requested. The PRSP, Section 9, Section B. Potable Water will be amended to reflect that the treated water tank site should mention a pump station, an adjacent building and lay down area for storage of parts and equipment. No revisions to the Draft EIR are necessary.

7-17 The comment requests changes to the PRSP. No changes to the Draft EIR are requested. The PRSP text will be revised to describe the design standards of the recycled water purveyor. No revisions to the Draft EIR are necessary.

7-18 The comment seeks minor text amendments to the PRSP and SAP. No changes to the Draft EIR are requested. The PRSP and SAP have been amended to address the comments noted. No revisions to the Draft EIR are necessary.

From: Crystal Jacobsen
Sent: Tuesday, February 19, 2019 7:47 AM
To: Shirlee Herrington; Leigh Chavez
Subject: FW: Placer Ranch meeting follow up

Letter 8

FYI

From: Brian Rickards [mailto:brickards@pcwa.net]
Sent: Friday, February 15, 2019 3:20 PM
To: Michele Kingsbury <MKingsbu@placer.ca.gov>
Cc: Tony Firenzi <tfirenzi@pcwa.net>; 'Vance Jones' <vjones@msce.com>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Mike Parker <mike.parker@ascentenvironmental.com>; Sydney Coatsworth <sydney.coatsworth@ascentenvironmental.com>
Subject: RE: Placer Ranch meeting follow up

Michele,
Thank you and Ascent. I appreciate your response. I will update PCWA's letter to include some language below; although we will still make the comment to provide additional clarity. 8-1

Thank you, have a good weekend!
Brian

From: Michele Kingsbury [mailto:MKingsbu@placer.ca.gov]
Sent: Thursday, February 14, 2019 3:31 PM
To: Brian Rickards <brickards@pcwa.net>
Cc: Tony Firenzi <tfirenzi@pcwa.net>; 'Vance Jones' <vjones@msce.com>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Mike Parker <mike.parker@ascentenvironmental.com>; Sydney Coatsworth <sydney.coatsworth@ascentenvironmental.com>
Subject: RE: Placer Ranch meeting follow up

Brian – hopefully below helps answer some questions.

1. PRS fee parcel. I believe you and Vance had spoken on how the LLTM will address that comment. If you need more information, please let me know.
2. Placer Parkway Pipeline from SR 65 to eastern edge of PRSP see page 3 – 66, "Water and Wastewater Infrastructure outside the PRSP Area", first bullet point. This section describes the Placer Parkway water lines as included in the definition of "Other Supporting Infrastructure.". Page 4-6 describes the DEIR approach which notes that "each impact discussion is divided into the following subsections and includes a separate CEQA conclusions for each:…The Net SAP Area, PRSP Area, and Other Supporting Infrastructure." The Placer Parkway water line falls under Other Supporting Infrastructure as it is defined. Therefore, when you read each impact section, the conclusions for Other Supporting Infrastructure include the Placer Parkway water by reference / definition of the Other Supporting Infrastructure.

Let me know fi this makes sense. Michele

From: Brian Rickards [mailto:brickards@pcwa.net]
Sent: Wednesday, February 13, 2019 11:46 AM
To: Michele Kingsbury

1

Cc: Tony Firenzi; 'Vance Jones'
Subject: RE: Placer Ranch meeting follow up

Hi Michele,
I just spoke with Vance Jones and he said all of the Specific Plan comments are minor and easily addressed. In one month we will be working on carving out a parcel in the LLTM at Campus Park Blvd and Foothills for a Pressure Reducing Station, with possible future pump station.

I plan on finalizing my comment letter on Friday, please let me know if your discussion with Ascent changes the content of the letter. I will include all comments to the Specific and Area Plan.

Thank you,
Brian Rickards

From: Michele Kingsbury [mailto:MKingsbu@placer.ca.gov]
Sent: Friday, February 08, 2019 8:57 AM
To: Brian Rickards <brickards@pcwa.net>
Subject: Re: Placer Ranch meeting follow up

I will follow up

Sent from my iPhone

On Feb 8, 2019, at 8:39 AM, Brian Rickards <brickards@pcwa.net> wrote:

> Good Morning Michele,
> Any update on Ascent's review of PCWA's comments?
>
> Thank you,
> Brian
>
> ---
>
> **From:** Brian Rickards
> **Sent:** Friday, February 01, 2019 9:18 AM
> **To:** 'Vance Jones' <vjones@msce.com>; Michele Kingsbury <MKingsbu@placer.ca.gov>
> **Cc:** Crystal Jacobsen (cjacobse@placer.ca.gov) <cjacobse@placer.ca.gov>; Tony Firenzi <tfirenzi@pcwa.net>; Heather Trejo <htrejo@pcwa.net>; Brent Smith <BSmith@pcwa.net>
> **Subject:** RE: Placer Ranch meeting follow up
>
> Vance and Michele,
> Thanks for your time this morning to talk through some of PCWA's comments. Based on our discussion, County staff will speak with Ascent to verify if comments were addressed in other locations and how some of these could be addressed. Michele, please let me know the conclusion of your discussion with Ascent. PCWA will finalize the comment letter within the next two weeks.
>
> Vance, as discussed, you will give me a call next week to discuss some of the comments related to the Specific and Area Plan.
>
> Thank you,
>
> **Brian Rickards, PE** | Associate Engineer | Technical Services Department, Engineering Division
> Placer County Water Agency | www.pcwa.net | 144 Ferguson Road | Auburn, CA 95603
> Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | brickards@pcwa.net

2

From: Vance Jones [mailto:vjones@msce.com]
Sent: Wednesday, January 30, 2019 11:46 AM
To: Michele Kingsbury <MKingsbu@placer.ca.gov>; Brian Rickards <brickards@pcwa.net>
Subject: RE: Placer Ranch meeting follow up

Folks, I'm open tomorrow or Friday morning. If one of those time slots work, please just send me a meeting invite for a call.

Thanks,

Vance Jones
MacKay & Somps Civil Engineers, Inc. | 1552 Eureka Road, Suite 100 | Roseville, CA 95661 | P: 916.773.1189 | F: 916.773.2595 | E: vjones@msce.com | W: www.msce.com
<image001.jpg>

From: Michele Kingsbury <MKingsbu@placer.ca.gov>
Sent: Wednesday, January 30, 2019 9:55 AM
To: Brian Rickards <brickards@pcwa.net>; Vance Jones <vjones@msce.com>
Subject: RE: Placer Ranch meeting follow up

I can make Friday at 8 am if you both can. I assume just a phone call.

From: Brian Rickards [mailto:brickards@pcwa.net]
Sent: Wednesday, January 30, 2019 9:04 AM
To: 'Vance Jones'
Cc: Michele Kingsbury
Subject: RE: Placer Ranch meeting follow up

Good Morning Vance,
I am reviewing the Sunset Area Plan/Placer Ranch Specific Plan dEIR and had to go back to our discussions during the Monday, September 10th meeting at the Domes. I was hoping to understand clearly how the PRS fee parcel was addressed as well as the Placer Parkway Pipeline from SR-65 to eastern edge of PRSP. Per the meeting, this EIR was going to address both of these items. Do you have time to discuss a few things with me this week. I am available at the following times:

1. Today 2:30-3:30,
2. Tomorrow after 9:30
3. Friday 7-9:00 am

Thank you,

Brian Rickards, PE | Associate Engineer | Technical Services Department, Engineering Division
Placer County Water Agency | www.pcwa.net | 144 Ferguson Road | Auburn, CA 95603
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | brickards@pcwa.net

From: Vance Jones [mailto:vjones@msce.com]
Sent: Tuesday, September 11, 2018 2:12 PM
To: Brian Rickards <brickards@pcwa.net>

Cc: Michele Kingsbury (MKingsbu@placer.ca.gov) <MKingsbu@placer.ca.gov>
Subject: RE: Placer Ranch meeting follow up

Brian- Thanks for following up with this information. …and very good to meet you yesterday, as well. Couple things:

Regarding the easement for the 42" line, the draft LLTM provides a 25' wide easement along the eastern edge of Parcel PR-87 (previously PR-85), so we'll upsize that to 35'. Easy fix.

For the PRS, I've got a couple ideas that I'd like to bounce off of our team. Thanks for the additional information and parameters, as that will help us tremendously. I'll circle back with you to discuss an approach before we revise any maps or exhibits.

Finally, the updated land use plan is attached for your use – two versions. The larger file plots 36x55 and is at 400-scale. The smaller file prints 11x17 and includes a summary table. The current plan is dated April 20, 2018, so please be sure that this is the version that everyone's using as we move forward.

Thanks,

Vance Jones
MacKay & Somps Civil Engineers, Inc. | 1552 Eureka Road, Suite 100 | Roseville, CA 95661 | P: 916.773.1189 | F: 916.773.2595 | E: vjones@msce.com | W: www.msce.com
<image002.jpg>

From: Brian Rickards <brickards@pcwa.net>
Sent: Monday, September 10, 2018 12:15 PM
To: Vance Jones <vjones@msce.com>; 'Colleen Karbowski' <ckarbowski@westyost.com>
Cc: Michele Kingsbury - Placer County (mkingsbu@placer.ca.gov) <mkingsbu@placer.ca.gov>; Heather Trejo <htrejo@pcwa.net>; Tony Firenzi <tfirenzi@pcwa.net>; Jeremy Shepard <jshepard@pcwa.net>; Curtis Lam (clam@hydroscience.com) <clam@hydroscience.com>; Mark Sauer <msauer@msce.com>; Brent Smith <BSmith@pcwa.net>; Jeff Apps <JApps@placer.ca.gov>; LaRoy Jones Jr. <ljones@pcwa.net>; Andy Hamilton <ahamilton@pcwa.net>; Frank Helmick - West Yost (fhelmick@westyost.com) <fhelmick@westyost.com>; Sandie Hewston <shewston@pcwa.net>
Subject: Placer Ranch meeting follow up

Vance,
It was nice meeting you today. Below are my action items from today's Placer Ranch EIR meeting (and the Large Lot Final Map preparation).

1. **Width of the 42-inch pipeline easement:** 35 feet
2. **PRS (& future PS) size and location near Campus Park Blvd & Foothills:** See attached exhibit. PCWA will need up to 0.25 Acres (building footprint is approximated at 0.1 acres). The location is preferred to be as close as possible to the intersection to minimize PRVs or eliminate excessive parallel piping; however, we are okay with all of the alternatives. Foothill Blvd will be the delineation between the two pressure zones. *Note: all other Pressure reducing stations will likely not be in a large building and will still need vehicular access to, but is assumed to be within the Highway Easement or PUE.*

Feel free to call to discuss any questions you may have. Please forward me the revised Placer Ranch Land Use Plan when you get a chance.

Colleen,
Can you add a 24" stub to the North on the east side of Placer Ranch's boundary. Each stub, north and south, should be 10' east of the Placer Ranch property line.

Thank you,

Brian Rickards, PE | Associate Engineer | Technical Services Department, Engineering Division
Placer County Water Agency | www.pcwa.net | 144 Ferguson Road | Auburn, CA 95603
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | brickards@pcwa.net

Letter 8	Placer County Water Agency Brian Rickards, P.E., Associate Engineer September 10, 2018; January 30, 2019; February 1, 2019; February 13, 2019; and February 15, 2019

8-1 The comment states that PCWA will update its comment letter dated January 31, 2019 (comment letter 7) to include language that came from discussions between County staff, project engineers, and PCWA. The updated comment letter is included as comment letter 9, below.

PCWA
water • energy • stewardship

PLACER COUNTY WATER AGE
SINCE 1957
BOARD OF DIRECTORS
Gray Allen, District 1
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Mike Lee, District 3
Robert Dugan, District 4
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BUSINESS CE
144 Ferguson Road
MAIL
P.O. Box 6570
Auburn, CA 95604
PHONE
(530) 823-4850
(800) 464-0030
WWW.PCWA.NET

Letter 9

February 22, 2019
File No. Planning

sent via email

cdraecs@placer.ca.gov
Placer County Community Development Resource Agency,
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Sunset Area Plan / Placer Ranch Specific Plan (State Clearinghouse No. 2016112012), Draft Environmental Impact Report (EIR)

To whom it may concern:

In review of the subject documents, Placer County Water Agency (PCWA) offers the following comments:

Draft Environmental Impact Report Comments:

03-Project Description

1. Per a meeting held on September 10, 2018, County staff agreed to include in this EIR the 42-inch pipeline from Highway 65 to the eastern boundary of Placer Ranch. It appears that this document excludes pipelines outside of the Placer Ranch Specific Plan (PRSP). Exhibit 3-3, 3-19, 3-24 and page 3-66 does not provide indisputable proof that the pipeline is covered within this document.
2. Exhibit 3-3 shows PCWA pipeline alignment within Placer Parkway; however, the pipeline will be a transmission main through PRSP, as shown in Exhibit 3-19. The 42-inch pipeline should be included within this EIR, currently areas east of PRSP appear to not be included.
3. Exhibit 3-19 should show Sunset Area Point of Connection (POC) on the west side, near the terminus. Please label all PCWA connections as "POCs" and all connections with other water purveyors as "interties."
4. Page 3-26 and Exhibit 3-3 should show offsite recycled water pipeline extension and include that extension in this EIR.
5. This project is building a pressure reducing station at Campus Park Boulevard and Foothills Boulevard. This site should also include a possible future pump station. Please include discussion of a parcel for this infrastructure and modify language to get project level clearance for California Environmental Quality Act (CEQA) moving forward. This site would be granted to PCWA in fee. Criteria was discussed for this parcel and requirements were given at a meeting between PCWA and County staff on September 10, 2018.
6. There is no agreement in place for PCWA being the recycled water purveyor. Although anticipated, please revise areas where PCWA is listed as the recycled water purveyor to describe this as the intended, but not absolute outcome. Example: Page 3-53, "The City of Roseville

9-1

provides wholesale recycled water to PCWA, which would serve as the recycle water retailer for the PRSP area."

7. Exhibit 3-24: The Placer Parkway pipeline does not appear to be covered by this EIR according to this map. Please provide additional clarity to ensure water line is covered in this document.
8. Page 3-66: Construction of the 42-inch pipeline west of the connection at Highway 65 may be constructed by PCWA or deferred to be constructed with and by the PRSP. This EIR should cover this entire pipeline from the tie-in at Highway 65 westward.

9-1 cont.

4.15 Utilities

1. Potable Water Master Plan and Recycled Water Master Plan, Appendix F and G respectively, are dated May 2017; however, the report and PCWA approved documents are dated July 18, 2017.
2. Provide a figure or narrative delineating the separation of the utilities within the roadway, ensuring Title 22 requirements are met.
3. Page 4.15-4: PCWA has deferred the first phase of the Ophir Water Treatment Plant (WTP) past 2019, until demand warrants new treatment capacity. We suggest rewording sentence to "The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. Plans to begin construction on the first phase of the Ophir WTP and associated conveyance pipelines, would provide treatment capacity of 10 mgd." Note, the design and permitting have been completed and construction will begin upon anticipated demand.
4. Page 4.15-19: Water Conservation: Senate Bill 606 (SB 606) and Assembly Bill 1668 (AB 1668) have been passed since the completion of the water master plans. These conservation measures authorize further water efficiency measures beyond Senate Bill x7-7, moving away from a comprehensive GPCD target. Even though water efficiency standards have not been fully established, this project should acknowledge this legislation.
5. Page 4.15-24, Policy 4.C.1: Per the Potable Water Master Plan, "It is the intent of [the project] that two groundwater wells at either Parcels PR-93, PR-96 PR-97 would each have a projected capacity of 1.0 million gallons per day (MGD), or approximately 695 gallons per minute (GPM), and groundwater is of such quality that only disinfection will be required to meet California Drinking Water Quality Standards. If the available capacity or water quality does not achieve these objectives, the Developer shall, at its own cost, work with PCWA to relocate the well site within the Project to an alternate mutually agreeable site until these objectives are satisfied." Furthermore, the developer shall conduct a groundwater study on the sub-basin's water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to the landfill. Policy 4.C.1 partially addresses the comment, but more is needed, including, but not limited to: burdened cost, additional sites, landfill impacts, etc.
6. Parcel PR-97, for the recycled water tank, pump station and well, went from 2.14 acres to 1.09 acres in the revised land use plan; however, no site plan was submitted to the Agency for approval. A site plan shall be submitted to confirm adequacy of property. With screening requirements of the infrastructure, the existing site may not be adequate. For tank and pump station locations, suggest screening to occur offsite where feasible – adjacent to park or open space areas.
7. Exhibit 4.15-1: Update the existing water distribution map with current infrastructure. This infrastructure appears to be approximately 3 years old and several distribution mains appear to be not represented within this map. Distribution maps can be obtained by contacting brickards@pcwa.net.
8. Page 4.15-40: "The Foothill WTP and Sunset WTP have approximately 1.8 MGD of capacity (as of January 2019) remaining" This document states 2.5 MGD, which is approximately 2 years old.

9-2

9. Page 4.15-40: Note that the 5.16 million gallon potable water storage tank will be co-located with a pump station and a lay-down yard for supplies.

9-2 cont.

In addition to the review of the draft EIR, PCWA offers the following edits of the Sunset Area Plan and the Placer Ranch Specific Plan.

Placer Ranch Specific Plan Comments:

1. The treated water tank site should mention a pump station, an adjacent building, and lay down area for storage of parts and equipment.
2. PCWA should be listed as the potable water purveyor for the region with specific reference to PCWA's standards regarding water supply, storage, and distribution system infrastructure. Design standards for recycled water should be per the recycled water purveyor.

- Section 9 Utilities
  - Page 09-2
    - Add "of acceptable water quality" to the requirements of the wells within the Water Supply & Demand paragraph
    - Add "corridor, PR-87" after "via the Placer Parkway" in bottom-right paragraph and delete "roadway corridors"
  - Page 09-4
    - Reword the recycled water retailer to "PCWA or Placer County" in bottom-right paragraph. Improvements are to be constructed to retailer's standard.
    - Wells are to be constructed to PCWA's standard, not Placer County.
    - PCWA is misspelled in second paragraph.

- Section 10 Implementation
  - Page 10-6
    - Revise entry of Maintenance Funding under Water Infrastructure row in Table 10-1 from "User Fees" to "PCWA fees"; also, add Table 10-1 to Table of Contents. See next comment.
    - Add Placer County Water Agency as a potential recycled water provider, current listing shows Placer County. Maintenance Funding of water and recycled water infrastructure should be the same.
  - Page 10-7
    - Clarification on Public Agency Impact Fees paragraph: PCWA is not part of the building permit process and building permits can be pulled without connection charges assessed. PCWA does require a developer to enter into a Facilities Agreement for funding and installation of facilities which can happen after issuance of a building permit. We suggest rewording to "The fee structure requires the payment of fees prior to issuance, or finalization, of a building permit."
    - Other Maintenance Funding options listed in Table 10-1 should be described in maintenance funding options description (e.g., User Fee and Property Tax).

- Development Standards Section 5 Public Facilities
  - Page 05-4
    - General Notes
      - If the available capacity or water quality of the groundwater does not achieve PCWA standards, the developer shall work with PCWA to

9-3

relocate well site within Project to an alternate mutually agreeable site such that objectives are satisfied.
- Developer shall conduct groundwater study on the sub-basin's water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill

- Replace "Placer County standards" with "all applicable codes" in the first requirement of Potable Water Facilities
- Revise second requirement to say "per the requirements of the Placer County Code, Division of Drinking Water, and PCWA requirements."
- Revise fourth requirement to state "Groundwater wells, the PRV station at Foothills and Campus Park, and pumping stations…"

- Page 05-5
  - The recycled water purveyor will likely be PCWA or Placer County; therefore, we suggest standards for the recycled water infrastructure shall be per the purveyor. PCWA will be the treated water purveyor and shall be constructed per PCWA standards.

9-3 cont.

- Design Guidelines Section 2 Landscape Architecture
  - Page 02-10
    - In general, pipelines should be within paved areas. Where select pipelines are within landscape corridors, trees and shrubs shall be prohibited within 10 feet of any water main

Sunset Area Plan Comments:

- Part II Section 9 Implementation
  - 9-5 Infrastructure Finance #5
    - Note that portions of the Sunset Area is within the City of Lincoln's Sphere of Influence (specifically the Urban Reserve). Lincoln is a retailer for all areas within the City's boundary.

If you have any questions or require additional information, please contact me at (530) 823-4845.

Sincerely,



Brian Rickards, P.E.
Associate Engineer
brickards@pcwa.net

BR:TF:sw

CC:
Brent Smith, bsmith@pcwa.net
Heather Trejo, htrejo@pcwa.net
Tony Firenzi, tfirenzi@pcwa.net
Michele Kingsbury, MKingsbu@placer.ca.gov
Crystal Jacobsen, CJacobse@placer.ca.gov
Shirlee Herrington, SHerring@placer.ca.gov

Z:\Planning\Land Use Plan Areas\Sunset Area\EIR\SAP-public draft comments_PCWA-signed.docx

Letter 9	Placer County Water Agency Brian Rickards, P.E., Associate Engineer February 22, 2019

This comment letter is virtually the same as the content of comment letter 7. Therefore, the responses simply cross-reference to responses to this letter.

9-1 See responses to comments 7-1 through 7-6.

9-2 See responses to comments 7-7 through 7-15.

9-3 See responses to comments 7-16 through 7-18.

Churchwell White LLP

churchwellwhite.com

1414 K Street, 3rd Floor
Sacramento, CA 95814
T 916.468.0950 | F 916.468.0951

Robin R. Baral
T: 916.468.0576
Robin@churchwellwhite.com

Letter 10

February 22, 2019

VIA U.S. MAIL & EMAIL (cdraecs@placer.ca.gov)

Shirlee Herrington
Environmental Coordination Services
Community Development Resource Agency
County of Placer
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft EIR
(State Clearinghouse No. 2016112012)

Dear Ms. Herrington:

Churchwell White LLP represents Western Placer Waste Management Authority (the "Authority") in connection with its review of the Sunset Area Plan/Placer Ranch Specific Plan (the "Project"). This letter provides the Authority's comments to the draft environmental impact report for the Project (the "Draft EIR"). In addition, attached to this letter is a technical report from environmental consultants who are deeply familiar with operations at the Western Regional Sanitary Landfill ("WRSL"), as their previous work is cited and referenced in Appendix J to the Draft EIR.

As you know, the WRSL is located in the center of the Sunset Area Plan ("SAP"), adjacent to the northern boundary of the Placer Ranch Specific Plan ("PRSP"). The Project, as currently proposed, would replace the existing landfill buffer, which currently prohibits any residential development within one mile of the WRSL site, with a new buffer that would allow residential development up to 1,000 feet from the perimeter of active landfill and recycling operations. The Project could also potentially allow commercial and recreational uses to encroach within the buffer zones of 1,000 feet and 500 feet, respectively.

In December 2016, the Authority submitted comments in response to the Notice of Preparation for the Draft EIR ("NOP"). The Authority's NOP comments detailed the critical importance of the WRSL site and the existing buffer zone, along with policies for adopting mitigation measures that Placer County (the "County") should consider as the lead agency for the Project. While the Authority appreciates its ongoing discussions with the County, the Authority has concerns that the Draft EIR does not adequately analyze the reduced buffer zone. In addition, the Draft EIR does not incorporate feasible

10-1

{CW074049.3}

mitigation measures, as required under CEQA, to reduce the reasonably foreseeable air quality and other impacts related to the reduced buffer zone and the proposed encroachment of development in close proximity to the WRSL.

If the landfill buffer must be reduced, the attached technical report shows that mitigation measures are available that would likely reduce potential odor impacts at the PRSP to a less-than-significant level. CEQA therefore requires the County to incorporate odor-reducing mitigation measures into the Draft EIR, especially given that the reduced landfill buffer is the central feature of the Project that would directly cause a significant increase in odor impacts if additional measures are not implemented.

10-1 cont.

1. The proposed buffer zone policy is internally inconsistent with the General Plan.

The Placer County General Plan was last updated by the County Board of Supervisors on May 21, 2013 (the "General Plan"). Under State law, the General Plan must include an integrated, internally consistent, and compatible statement of policies.[1] When elements of a general plan are found to be internally inconsistent, on judicial review, "the appropriate remedy is to issue a writ of mandate requiring a county's board of supervisors to set aside the inconsistent elements so that they can be amended to achieve the statutorily required correlation and consistency."[2] In addition, under CEQA, the Draft EIR must disclose if the Project is inconsistent with any applicable land use plan, policy, or mandatory provision in the General Plan.[3]

The Project proposes to develop residential, commercial and recreational uses within the existing and proposed landfill buffer zones, along with General Plan amendments that, if adopted, would result in an internal, irreconcilable inconsistency with the following mandatory provision in the General Plan:

10-2

> BUFFER ZONE PRESERVATION
>
> Land use buffer zones shall be reserved and guaranteed in perpetuity through land acquisition, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent proposed development projects providing the necessary funding.[4]

Both the PRSP and SAP would authorize commercial, recreational and residential development within the existing and proposed landfill buffer zones. The Draft EIR Project Description, however, makes no reference to this conservation requirement.

[1] Cal. Gov. Code § 65300.5.

[2] *Murrieta Valley Unified School Dist. v. County of Riverside* (1991) 228 Cal.App.3d 1212, 1235.

[3] 14 Cal. Code Reg. § 15125; Placer County Environmental Checklist.

[4] Placer County General Plan, Part 1, Land Use/Circulation Diagrams and Standards p. 24.

{CW074049.3}

Although the Draft EIR refers to agricultural and open space easements in Chapter 4.10 (Land Use) and public trail easements in Chapter 4.13 (Public Services), it makes no reference to the landfill buffer conservation easement requirement, or that adjacent development projects, such as PRSP, must bear the cost of acquiring such easements.

In addition, the Draft EIR does not discuss how the proposed General Plan amendments to further reduce the residential landfill buffer zone from 2,000 to 1,000, or to further reduce the commercial and recreational buffers to less than 1,000 and 500 feet, should be reconciled with the General Plan's mandatory provision to permanently conserve all land within the buffer zone.

The County's existing landfill buffer policy culminated after the result of a lengthy, multiyear General Plan update throughout the 1990's. The conservation easement requirement clearly represents a General Plan policy "adopted for the purpose of avoiding or mitigating an environmental effect."[5] If the County's intent now is to transition from a conservation policy to a development model within the landfill buffer, this change in policy must be thoroughly analyzed in the Draft EIR. The baseline condition requiring the acquisition of conservation easements must be disclosed and analyzed, impacts related to the removal of the conservation requirement must be identified, and additional or functionally equivalent mitigation measures necessary to reduce future land use conflicts with the WRSL must be implemented.

10-2 cont.

The Authority is willing to discuss functionally equivalent mitigation measures that could preclude the need for conservation easements, provided that such measures include an ongoing enforcement mechanism, similar to an easement in perpetuity. Examples of ongoing mitigation measures are provided in the technical report. In addition, durable finance mechanisms must be adopted to ensure that mitigation measures can be implemented in an incremental, ongoing basis throughout the 80-year buildout scenario contemplated in the Draft EIR. Further refinements to the mitigation measures in the Draft EIR are clearly needed, depending on the County's proposed resolution of the conservation requirement.

Lastly, to fully ensure General Plan consistency, the County should closely review the requirements set forth in Part III (General Standards for Consideration of Future Amendments to the General Plan). Part III includes other mandatory considerations related to the existing landfill buffer zone and other provisions that must be reconciled with the proposed General Plan amendments for the Project.

[5] Placer County Environmental Checklist.

{CW074049.3}

2. Solid waste generated by the proposed Project may exceed operational capacities at the WRSL.

Chapter 4.15 of the Draft EIR (Utilities) examines waste management operations at the WRSL. The Environmental Setting in Section 4.15.2 briefly discusses the key components of the WRSL, such as the Materials Recovery Facility (MRF), which includes separate processing of construction and demolition waste, and green waste. The Environmental Setting also briefly describes composting and landfill operations at the WRSL, in addition to the Permanent Household Hazardous Waste Collection Facility.

In the analysis of Impacts and Mitigation Measures, however, Chapter 4.15 examines the capacity of the landfill area only, and does not analyze the individual components that comprise the WRSL site, which were clearly identified in the previous section. On closer review of the MRF, for example, the construction, demolition and green waste operations are currently near their maximum operating capacities. Implementation of the Project could therefore exceed the ability of the WRSL and MRF to adequately process construction, demolition and green waste. As a result, the Draft EIR incorrectly concludes that "[t]he MRF and the WRSL have adequate capacity for disposal of solid waste generated by construction and operation of the PRSP."[6] Implementation of the Project will in fact result in potentially significant impacts to the operational capacity of the MRF, and additional mitigation measures are necessary to address this impact.

10-3

Although the Draft EIR notes that the Authority is currently proceeding with a master planning process to improve and increase operations at the site, these expansion plans remain highly conceptual and are not yet complete. In addition, even if the master planning process had concluded, the Project must address actual capacity limitations and implement measures to address impacts related to the Project, such as the generation of construction and demolition waste, and green waste, that could potentially exceed the current operational limits at the WRSL.

3. The Draft EIR must include mitigation measures to finance the facilities, services and personnel that would be required to reduce odors at the WRSL

The Draft EIR finds that the "cumulative demand for solid waste services would be a potentially significant impact."[7] In addressing this potential impact, however, the Draft EIR states that the PRSP and SAP would be "required by Placer County General Plan Policies 4.B.1 and 4.B.2 to pay their fair share of the cost of all existing public facilities and the cost of upgrading existing [solid waste processing] facilities or constructing new facilities that would be needed to serve the new development," and that "[t]hese

10-4

[6] Draft EIR, p. 4.15-57.

[7] Draft EIR, p. 4.15-69.

{CW074049.3}

policies would serve to avoid any project contribution to significant adverse effects related to solid waste disposal. The impact would be less than significant."[8]

The Draft EIR, however, does not specifically identify how the Project would contribute fair share fees to contribute towards the new facilities, operations and personnel that would be needed at the WRSL. In addition, additional contributions are needed so that the Authority can implement additional measures to reduce odors, especially where such measures would not otherwise be needed, but for the reduced landfill buffer. Moreover, tipping fees by themselves may be insufficient to generate sufficient revenue over the long term to address the level of odor reduction that may be needed to ensure that future land use conflicts are avoided if the existing landfill buffer is reduced.[9] In addition, where the need for additional odor reductions are needed directly as a result of development of the PRSP within the landfill buffer, the costs for addressing those impacts should not be spread to all WRSL customers through generally applicable tipping fees.

10-4 cont.

Throughout other sections of the Draft EIR, mitigation measures are proposed to require the payment of fair share fees, and the creation of special taxes and assessments to fund additional facilities, maintenance and personnel costs that will be required as a result of the buildout of the Project.[10] In addition, the Draft EIR includes mitigation measures regarding transportation improvements and the Pleasant Grove Retention Facility, both of which are offsite to the Project. Similar mitigation measures must be implemented to address the new facilities, operational adjustments, and new personnel that will be required at the WRSL to address potential odor impacts directly caused by the development and buildout of the Project within the existing landfill buffer.

4. The Draft EIR's analysis in Impact 4.3-6 is inconsistent with the odor analyses in Appendix J and must be revised.

The Draft EIR's analysis of odor impacts raises several concerns that must be corrected prior to the County taking any action to certify the EIR or approve the Project.

Under Impact 4.3-6, the Draft EIR asserts that "odor impacts are subjective and there are no quantifiable thresholds of significance...." Appendix J to the Draft EIR, however, clearly states an established threshold of significance using the dilutions to threshold ("DT") metric:

10-5

> Generally, odor is frequently considered likely to be offensive when it exceeds 10 DT, may be considered offensive when it exceeds 8 DT, and is

[8] *Id.*

[9] See, e.g., Landfill Tipping Fees in California, CalRecycle February 2015

[10] See, e.g., Mitigation Measures 4.13-1a, 4.13-2, 4.13-4, 4.13-8,

{CW074049.3}

> sometimes considered offensive when it exceeds 5 DT. These thresholds are sometimes used as regulatory odor nuisance thresholds and are illustrative of the range of odor concentrations that are considered a nuisance.[11]

Appendix J therefore provides a quantifiable metric with regard to odor impacts that the Draft EIR should incorporate as its significance threshold for odors.

Moreover, the Draft EIR mistakenly relies on unrelated holdings by the First District Court of Appeal,[12] regarding Receptor Thresholds, to conclude that the Draft EIR is "not strictly required" to evaluate impacts of existing odor sources such as WRSL. The WRSL Incremental Odor Evaluation in Appendix J clearly demonstrates that the Project would exacerbate existing odors generated by the WRSL if additional mitigation measures are not implemented. In addition, odor impacts are directly relevant in this case because the General Plan amendment for the Project proposes to reduce the landfill buffer zone to allow residential, commercial and recreational uses to encroach closer to the WRSL. Reduction of the buffer zone therefore serves as the key Project feature that would potentially expose future residents to odors, and buildout of the Project would generally lead to the production of more waste that would also serve to exacerbate the potential for future odor impacts from the WRSL.

10-5 cont.

Appendix J analyzes existing, baseline odors, baseline odors plus the Project, and future odors plus the Project, to determine the incremental impact of Project-related odors. Appendix J then concludes that the odor intensity and footprint of the WRSL site will continue to increase, and that the solid waste generated by the Project will play a significant role in contributing to that increase. The Draft EIR, however, ignores the analysis in Appendix J and concludes that "neither Placer County nor PCAPCD has adopted nor subscribes to any specific scheme of odor standards or thresholds."[13]

Ultimately, Appendix J constitutes substantial evidence of a significant odor impact that would be caused directly by the Project's proposed removal of the landfill buffer zone, and the Project's incremental contribution of solid waste disposal at the WRSL.

Whether or not the County applies a quantitative or qualitative significance threshold with regard to odors, the Draft EIR concludes that odor impacts resulting from implementation of the Project would be significant. Despite this significance finding, however, the Draft EIR proposes no mitigation measures to reduce potential odor impacts. On the other hand, the Draft EIR explains that the County rejected a proposal

[11] Draft EIR, Appendix J, WRSL Incremental Odor Evaluation, p. 6

[12] *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2016) 2 Cal.App. 5th 1067

[13] Draft EIR, p. 4.3-50.

{CW074049.3}

to adopt a regional mitigation fee to address improvements at the WRSL site that would reduce odor impacts.[14]

Again, the failure to implement feasible mitigation measures pursuant to Impact 4.3-6 is somewhat baffling, given that the proposed reduction of the landfill buffer zone is a key component for allowing the proposed buildout of the PRSP. Although the Authority is proactively evaluating site improvements at the WRSL to reduce odors, the reduced buffer zone will undoubtedly require the Authority to take additional measures, with additional costs, that would not need to be incurred except due to the development of PRSP and SAP within the existing buffer zones.

10-5 cont.

As noted above, the Draft EIR references the County's General Plan policy requiring new developments to pay their fair share for the cost of new facilities and services. Impact 4.3-6 therefore must include enforceable mitigation measures to ensure that fair share contributions are provided through the development of the PRSP and SAP, especially where the need for new services, facilities and personnel is directly caused by the reduced landfill buffer zone. Those costs should not be borne by the Authority, nor its Member Agencies or existing ratepayers.

5. The Draft EIR's analysis in Impact 4.15-11 must be revised to include enforceable mitigation measures, to reduce potential odor impacts that will be directly caused by the reduced landfill buffer zone.

Under CEQA, the County clearly has the authority to adopt measures requiring the developer and future properties within the SAP or PRSP to mitigate odors at the WRSL, provided that such measures are proportional to the impacts caused by the Project.[15]

Under Impact 4.15-11, the Draft EIR finds that the reduced landfill buffer zone will lead to increased complaints regarding the WRSL if additional measures are not taken to reduce odors. Rather than identify mitigation measures to address this impact, however, the Draft EIR states that the Authority is proactively engaged in community outreach, and taking measures to reduce odors from the WRSL. In reciting all of the current actions taken by the Authority to reduce potential odor impacts, the Draft EIR ignores the implementation of mitigation measures to address potential future land use conflicts due to the reduced landfill buffer zone.

10-6

The Authority will undoubtedly be required to greatly accelerate its current outreach and odor management operations in order to adjust to residential, commercial and recreational encroachment proposed by the PRSP and SAP. The Draft EIR concludes, however, without any substantial evidence, that the potential risks to expansion of the WRSL due to the reduced buffer zone are speculative. On the contrary, landfill

[14] Draft EIR, p. 4.3-51.

[15] 14 Cal. Code Reg. § 15126.4.

{CW074049.3}

expansions have constantly been the target of litigation, regardless of the investments made by those agencies, or their importance as assets to the community. Bringing additional residents closer to the landfill buffer will significantly increase the risk of additional lawsuits, especially if the Project does not contribute to suitable measures to reduce odors at the WRSL.

Even with the execution of landowner notices, implementation of the Project will require the Authority to introduce additional odor control measures that would not otherwise be needed if the existing landfill buffer zone remained in place. Existing customers should not be required to incur costs related to new development that is encroaching onto the existing landfill buffer zone.

10-6 cont.

6. Numerous mitigation measures are available to reduce odor impacts and operational deficiencies at the WRSL caused by the Project.

Mitigation Measure 4.10-2 in the Draft EIR identifies some basic measures for mitigating odor impacts for the properties located within the PRSP and SAP. Building design, landscaping buffers and deed notifications are important elements that should remain as mitigation measures for the Project. Downstream measures to reduce potential odor impacts, however, are far less effective than source controls at the WRSL, which would achieve much greater odor reductions. Mitigation measures must be implemented to require the PRSP and SAP to contribute to operational and facility improvements at the WRSL, in order for the County to justify any reduction to the existing landfill buffer.

In Appendix J, SCS Engineers provides a Review of Odor Management at the WRSL, which expressly finds that additional mitigation measures should be implemented at the WRSL to reduce potential odor impacts, thereby reducing future land use conflicts. For example, the SCS report identifies gas flaring improvements, expanded use of misters, the use of additional covers and other improvements that would reduce odors at the WRSL. Appendix J is based in part on a literature review, including the 2015 EMC report prepared by the CE Schmidt and TR Card, who have prepared the attached technical report.

10-7

The attached technical report reviews potential mitigation measures proposed in Appendix J, and the report suggests a broader array of measures for reducing odors at the WRSL. Potential mitigation measures identified by SCS Engineers, and elaborated by the attached report, include the following:

- Improved use of gas flaring and engines;
- Development of an automated gas system to respond to changes in barometric pressure and optimized gas recovery;

{CW074049.3}

- Improvements to landfill cover and use of temporary membrane landfill covers;
- Ongoing system-wide assessments;
- Greater use of odor reducing agents;
- Development of a biosolids and wood waste processing facility;
- Incorporation of odor masking agents during the use of misters;
- Improvements to, and scaling up of, aerated static pile composting;
- General odor controls, such as tree lines, meteorological monitoring, odor monitoring on the PRSP and SAP sites; and
- Dedicating Authority personnel to ongoing odor inspection, management and supervision.

The report concludes that effective odor reduction mitigation strategies can be implemented on the WRSL site to achieve an odor emission reduction of around 80%. If such reductions were achieved, the reduced landfill buffer would cause far less odor impacts. Odor episodes would be less frequent, with shorter duration, and with lower concentration or drift to offsite areas of the WRSL.

10-7 cont.

Based on the attached report, an 80% reduction of the existing odor profile at the WRSL is possible, using known techniques. Over time, additional measures will likely emerge to further control and reduce odors at the WRSL. Under either a qualitative or quantitative approach to analyzing odor impacts, measures to reduce odors must be implemented as enforceable mitigation measures for the Project, in-lieu of the existing requirement in the General Plan to permanently conserve all land within the landfill buffer zone.

Additional air dispersion modeling would help to refine the quantitative (or qualitative) reduction that additional mitigation measures could provide to reduce odors from the WRSL. Those additional mitigation measures must be implemented if the modeling shows that their implementation would significantly reduce the DT level or hedonic tone, especially in the areas proposed for development within the reduced landfill buffer zone. In addition, measures must be implemented to allocate the fair share of those costs to the Project. The Authority looks forward to working with the County in

this modeling, to identify the most cost-effective measures for the Draft EIR to implement. 10-7 cont.

7. The Draft EIR must examine alternatives to the proposed landfill buffer.

The reduced landfill buffer is a key component of the PRSP, as currently envisioned. Several commenters to the NOP raised concerns regarding the proposed reduction of the landfill buffer. The Draft EIR therefore should have analyzed a Project alternative in which the landfill buffer zone remained in place, with development intensities revised to account for the existing landfill buffer. 10-8

8. The Draft EIR should analyze alternative alignments for water and recycled water lines.

Figure 4.15-4 in the Draft EIR identifies a new 12-inch potable water pipeline extending through the center of the Authority's property located directly to the east of the WRSL. In addition, Figure 7 in Appendix B to the Draft EIR identifies an 8-inch recycled water pipeline extending along this same alignment. The Authority is currently developing a master plan that could entail the placement of a new landfill on the parcel to the east of the WRSL. The placement of pipelines through the Authority's property therefore may be infeasible. Alternative pipeline alignments that do not cut through the Authority's property should be considered in the Final EIR.

In conclusion, the purpose of this letter is to identify areas where the Draft EIR should be revised in accordance with CEQA and, more importantly, to address additional measures that the Draft EIR must implement, as required under CEQA, to mitigate the direct impacts that would result from the reduction of the existing landfill buffer. 10-9

Although the Authority has additional concerns regarding other aspects of the Project, this letter focuses on the proposed landfill buffer as the key issue that threatens the long-term viability of the WRSL. If warranted, the Authority may submit additional comments regarding other aspects of the Project at a later date.

Lastly, résumés for CE Schmidt and TR Card are provided for reference, to illustrate their extensive background in air quality impacts relative to landfills and project siting; the Authority does not intend for the County to provide any responses to those materials in the Final EIR.

Sincerely,

Churchwell **White** LLP



Robin R. Baral

{CW074049.3}

Letter 10	Western Placer Waste Management Authority Robin R. Baral, Churchwell White LLP February 22, 2019

10-1 The comment suggests that the Draft EIR does not appropriately analyze the reduction of the landfill buffer, and it states that mitigation measures are available to reduce odor impacts in the PRSP area to a less-than-significant level. See Master Response 4: Odors regarding the Draft EIR's discussion of odors, the landfill buffer, and mitigation measures.

10-2 The comment suggests that the project's proposal to amend the County's General Plan sanitary landfill buffer policy is inconsistent with the General Plan's provision related to buffer zone preservation.

The "Land Use Buffer Zone Standards" section on page 18 in the County's General Plan notes:

> This General Plan requires the use of buffer zones in several types of development. While the exact dimensions of the buffer zones and specific uses allowed in buffer zones will be determined through the County's specific plan, land use permit, and/or subdivision review process, buffer zones must conform to the following standards (as illustrated conceptually in Figures 1-3 through 1-6); provided, however, different buffer zone standards may be established within a Specific Plan as part of the Specific Plan approval.

This language clearly states that the buffers outlined in the General Plan Land Use Buffer Zone Standards are to be considered, applied, and determined through project review and that different buffer zone standards may be established within a Specific Plan. To that end, the PRSP and any future specific plan proposed within the Sunset Area may propose buffer zones that differ from what is illustrated in the General Plan.

The comment's assertion that the project's proposal to modify the General Plan sanitary landfill buffer zone is inconsistent with the "Buffer Zone Preservation" provision contained within the Land Use Buffer Zone Standard section of the General Plan is incorrect. As outlined above, when applying buffer zone standards through project review, the first step is to assess what buffer applies to the project. Following that determination and application of the applicable buffer zone for a project, the relevant buffer zone standards and related provisions contained within the Land Use Buffer Zone Standard section of the General Plan are then required to be "reserved and guaranteed in perpetuity through land acquisitions, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent proposed development projects providing the necessary funding." The purpose of this provision is to protect and memorialize the established buffer zone after it has been applied to a project. Therefore, the project's proposal to modify the sanitary landfill buffer zone is not inconsistent with this provision.

10-3 The comment states that the Draft EIR evaluated the capacity of the landfill only but that it did not evaluate the capacity of the various components. The comment states that the construction, demolition, and green waste operations are nearing maximum capacity and may not have adequate capacity to serve the project as concluded in the Draft EIR. The comment further states that while WPWMA is currently working on expansion plans, these plans are conceptual and not yet complete.

Analyses of impacts related to solid waste capacity do not typically break down the overall capacity of a facility into individual components of a facility. However, for purposes of clarity, additional information is being provided as part of this response. WPWMA's 2016 Transfer Processing Report (TPR) for the MRF provides some of the capacity data for the individual MRF components described by the comment. The TPR (page 8) states that the capacity of the MRF is comprised of the processing capacity (the ability to convey and sort through the waste and other materials) and the storage capacity (the physical ability of the plant to store materials prior to being processed). The

combined processing capacity of the construction and demolition, green and wood waste, and expanded composting areas of the MRF is 400 tons per day. The TPR outlines the typical quantities of materials received per day within these three categories: 185 tons of construction and demolition materials, 173 tons of green waste, and 8 tons of wood waste. Therefore, the facility currently receives 366 tons of these materials per typical day, which represents approximately 29 percent of the typical daily waste received by the MRF, and the MRF has 34 tons per day of available processing capacity for these categories of materials (CalRecycle 2016).

Regarding construction waste, the Draft EIR states that construction in the net SAP area would, after recycling and/or salvaging a minimum of 65 percent of construction waste, generate 115,895 cubic yards, or 66,225 tons (see Draft EIR, page 4.15-54). Spread across an 80-year buildout period, development in the net SAP area would generate 828 tons of construction waste per year, or 2.3 tons per day. Construction in the PRSP area would generate 43,886 tons of construction waste, which, spread across the PRSP's expected 20-year buildout period, would be 2,194 tons of construction waste per year, or 6 tons per day. Therefore, construction waste generated by development in the net SAP area and PRSP area would be 8.3 tons per day combined, which would represent less than a 5-percent increase in daily construction and demolition waste received at the MRF.

Operation of the project would generate green waste and wood waste. An estimated breakdown and total are provided in Table 3-7. As shown in Table 3-7, the project would generate approximately 10.1 tons of green waste and wood waste per day, which constitutes less than a 6-percent increase in daily green waste and wood waste received at the MRF.

Table 3-7 Estimated Project-Generated Green Waste and Wood Waste[1]

Land Use Type	Percent of MSW Stream	Net SAP Area (tons/day)	PRSP Area (tons/day)	Total (tons/day)
Residential[2]	5.5	1.1	2.8	3.9
Commercial[3]	9.3	3.04	2.2	5.2
Industrial[5]	1.0	0.7[6]	–	0.7
University[7]	5.4	–	0.3	0.3
Total				**10.1**

1 Includes Leaves and Grass, Prunings and Trimmings, and Branches and Stumps from CalRecycle's waste stream rate table for Placer County

2 Uses CalRecycle's "Residential" waste stream rate tables

3 Uses the "Services-Professional, Technical, and Financial" Business Group from CalRecycle's Commercial waste stream rate tables

4 Includes SAP Categories General Commercial, EMU, and Business Park from Draft EIR Table 4.15-13

5 Uses the "Manufacturing-All Other" Business Group from CalRecycle's Commercial waste stream rate tables

6 Includes SAP Categories Innovation Center, Eco-Industrial, and Light Industrial from Draft EIR Table 4.15-13

7 Uses the "Education" Business Group from CalRecycle's Commercial waste stream rate tables

Source: Compiled by Ascent from SAP/PRSP Draft EIR and CalRecycle 2019

The project's total combined construction and demolition waste, wood waste, and green waste would be 18.4 tons per day, which is approximately 54 percent of the 34 tons per day of available processing capacity for these categories of materials. Therefore, it appears that, even within these individual components of the MRF, there is adequate capacity to serve the project.

Unlike the landfill capacity discussion in the Draft EIR, processing capacity associated with the MRF is not based on a finite resource (such as the area of a landfill). Processing capacity can be increased with an increase in equipment, staffing, etc. Under a buildout horizon of 80-plus years for the net SAP area and 20 years for the PRSP area, the processing capacities associated with the MRF would likely be adjusted. In the unlikely event that processing capacity is not adjusted, and solid waste generated under cumulative buildout conditions exceeds the capacity of these individual components of the MRF, then these types of waste may need to be hauled elsewhere. But this circumstance is speculative and does not require evaluation in the Draft EIR.

Regarding storage capacity, the TPR indicates that the MRF had a storage capacity of 1,800 tons of unprocessed materials and a storage capacity of the construction and demolition waste and wood and green waste of 2,350 tons. The Draft EIR states (page 4.15-57) that, combined, operation of new uses in the net SAP and PRSP areas would generate 201 tons of solid waste on a daily basis. Therefore, the daily waste generated would consist of 11 percent of the storage capacity. However, as stated in the Draft EIR, the daily waste generated is 36 percent of the available daily permitted processing capacity. If the facility has sufficient storage to achieve its processing capacity and the project's daily waste would consume less of the storage capacity than the processing capacity, then the project would likely have enough storage capacity to serve the project. Also, as discussed above, storage capacity is not a finite resource, and given the long-term buildout of the net SAP area and PRSP area, it is likely that storage capacity would be adjusted. If it is not, then waste may need to be hauled elsewhere; however, as discussed above, this scenario is speculative and does not require evaluation in the Draft EIR.

10-4 The comment raises questions related to fair-share funding for solid waste service and odor impacts. Section 4.15 of the Draft EIR, "Utilities," evaluated impacts of the project related to solid waste service capacity and determined that implementing the proposed project would result in less-than-significant impacts, both at the individual project level and at the cumulative level. See response to comment 10-3 for more detail. See Master Response 4: Odors regarding payment of fair-share fees to address odor impacts.

10-5 The comment takes issue with the Draft EIR's characterization of significance thresholds related to odors. See Master Response 4: Odors regarding the use of thresholds of significance for the odor impact analysis in the Draft EIR and mitigation measures proposed to reduce significant impacts.

10-6 The comment states that the Impact 4.15-11 must be revised to include enforceable mitigation measures, to reduce potential odor impacts that would be directly caused by the reduced landfill buffer zone. This issue is addressed in Master Response 4: Odors.

10-7 The comment identifies mitigation measures that the comment suggests would reduce odor-related impacts associated with the WRSL. See Master Response 4: Odors regarding mitigation measures for odor impacts and potential WRSL operational impacts.

10-8 The comment states that the Draft EIR should have analyzed an alternative in which the landfill buffer remained in place, with development intensities revised to account for the existing landfill buffer. See Master Response 1: Alternatives Analysis for a general discussion regarding the adequacy of the Draft EIR's alternatives analysis. Master Response 2: Citizen-Initiated Smart Growth Plan describes the constraints related to an alternative design that maintains the 1-mile landfill buffer. As described in the master response, the 1-mile buffer around the centrally located WPWMA property, excludes the entire center of the SAP area, leaving only the corners and edges for development of sensitive land uses (including the Sac State–Placer Center, other schools, and residential land uses). Much of the land in these areas is currently developed with industrial and warehouse uses. In essence, the resulting alternative would closely resemble the 1997 SIA Plan, which is already included in the Draft EIR's alternatives analysis as the No Project Alternative.

10-9 The comment suggests that the locations of pipes noted in Figure 4.15-4 and the recycled water pipeline identified in Figure 7 in Appendix B to the Draft EIR are not correct. To clarify, there is no Figure 4.15-4 in the Draft EIR. It is assumed the commenter is referencing Exhibit 4.15-4, Sunset Area Potable Water System. Exhibit 4.15-4 shows a highly conceptual diagram depicting pipeline diameter and general alignment locations to serve proposed development in the SAP area. Potential pipeline alignments were based primarily on existing rights-of-way, and in the absence of rights-of-way, on existing property lines. Within the net SAP area, more specific public rights of ways would be determined at the specific-plan or site-plan stage when those subsequent developments are proposed, and the pipeline alignments would be developed to coincide with those locations.

3.2.2 Organizations

From: Shirlee Herrington
Sent: Friday, February 01, 2019 2:07 PM
To: AEL-Leslie Warren
Subject: FW: Government shutdown and SAP/PRSP Comments,

Letter 11

Good Afternoon Ms. Warren,

Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. The CEQA Guidelines identify a public review period of 45 days, which was met and exceeded by the referenced project's review period of 67 days. There is no basis under CEQA to extend that timeframe due to a federal government shutdown, and most all of the information needed to evaluate the project is available on-line or through State agencies. That being said, staff will take into account the federal government shutdown for any comments received by federal agencies after the comment period. Lastly, you are on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities to for public participation and input.

Thanks.

Shirlee Herrington
Community Development Technician
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190, Auburn, CA 95603
530-745-3132 fax 530-745-3080

-----Original Message-----
From: Leslie Warren [mailto:allianceforenviroleadership@gmail.com]
Sent: Thursday, January 24, 2019 7:01 PM
To: Todd Leopold <TLeopold@placer.ca.gov>; ejvivald@placer.ca.gov; Robert Weygandt <RWeygand@placer.ca.gov>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Michele Kingsbury <MKingsbu@placer.ca.gov>
Cc: Tamara S. Galanter <galanter@smwlaw.com>; Michael Garabedian <michaelgarabedian@earthlink.net>
Subject: Government shutdown and SAP/PRSP Comments,

Dear Ladies and Gentlemen,

We are concerned that Federal agencies that would ordinarily prepare comments on the subject DEIR are unable to do so, due to the Federal government shutdown. As the DEIR has identified significant impacts to Federally listed species and to jurisdictional waters of the United States, among other issues, we feel that it is imperative that Federal agencies participate in the environmental review process. **11-1**

Will you please advise us about how the shutdown is affecting all the Federal agencies from whom comments would, under normal circumstances, be expected?

Many thanks for your reply.

Sincerely,

Leslie Warren, Chair
Alliance for Environmental Leadership

1

Subject: Access to the CISGP

From: Alliance for Environmental Leadership [mailto:allianceforenviroleadership@gmail.com]
Sent: Saturday, January 26, 2019 8:15 PM
To: Placer County Planning
Subject: Fwd: ✨Access to the CISGP ✨

Dear EJ:
Please share this email with the Chair and Members of the Placer County Planning Commission and cc me at allainceforenviroleadership@gmail.com. Many thanks. Leslie Warren

Dear Chair and Members of the Placer County Planning Commission:

Thank you so very much for giving me the opportunity to introduce myself and the Alliance for Environmental Leadership at your Planning Commission meeting on January 24th.

You may recall that I explained that the Alliance for Environmental Leadership, representing 14 local environmental and civic organizations, received grant funding to create a Citizen Initiated Smart Growth Plan for the West Placer Prairie that we will submit as an alternative to the County's Sunset Area Plan and Placer Ranch Specific Plan.

The Draft EIR for the County's Plan for the SA/PRSP in West Placer has identified 57 significant impacts that cannot be mitigated and many of these significant impacts run contrary to State and local policy. All is not lost. If you take this opportunity to review the Citizen Initiated Smart Growth Plan, you will find that the County's growth and economic development objectives can still be met, without harm to the environment or citizens. The Citizen Initiated Smart Growth Plan is an agile, innovative and future forward Plan has the potential to lift Placer County into a leadership position globally. 11-2

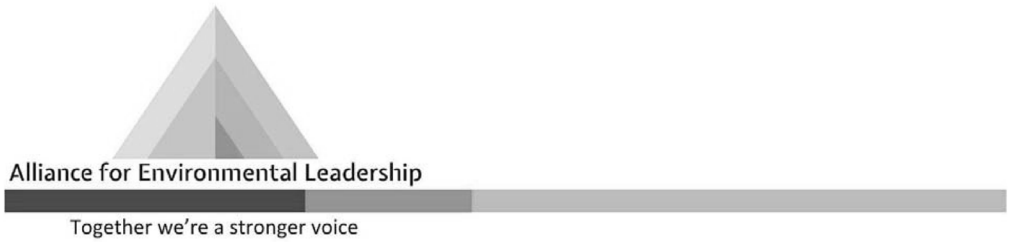
These two links are good for reading the Citizen Initiated Smart Growth Plan and sharable with the larger community:

In the CISGP Project Library:
CISGP_Phase1_Spreads.pdf
https://drive.google.com/file/d/1Vo54Fw2D-DewZoNpvI78RursshVOp4bw/view?usp=sharing

On Issuu, an online magazine platform:
https://issuu.com/g.marsh/docs/cisgp_phase1_sheets

You are welcome to excerpt pages and attach them to your DEIR comments or letters to the editor. If you are interested in a printed version, let Leslie and I know! We can print them beautifully for approximately $30 in full color.

1



February 9, 2019

To: AEL Community and Colleagues

FR: Leslie Warren, Chair, Alliance for Environmental Leadership

RE: Comparing CISGP and SAP/PRSP

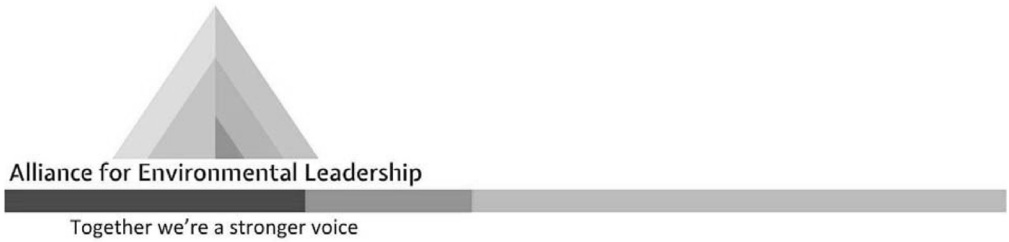
Many of you have requested a comparison of the CISGP and the County's SAP/PRSP. As the proposed transformation of a natural ecosystem to a new industrial city is so complex, only a partial comparison is provided here. I refer you to pages 46-78 of the CISGP which attached hereto for a comprehensive set of comparison tables of natural resources and agricultural systems.

Comparing AEL's CISGP and Placer County's SAP/PRSP

Job Center Concept versus Innovation Ecosystem Comparison

Placer County's proposed Sunset Area Plan/Placer Ranch Specific Plan will remove 13.9 square miles of farmland, vernal pool wetland, the headwaters of two watersheds and their associated riparian forest and replace this natural prairie ecosystem with a) a 39 million sq. ft. industrial/retail complex, b) primarily single-family low-density residential sprawl and c) a 33,000 student university and 4,000 units of university housing. While the County states an objective to create a collaborative environment within the SAP/PRSP, they fail to do so because the County looks at three unique blocks of ownership and designs accordingly - even to the point of using major roadways to segregate. 11-3

The CISGP provides comparable business and industrial opportunity through a spectrum of industrial mixed-uses that locate residences adjacent to the highest



employment density in such a way that fosters community. Because the County has maintained a decades-long vision to bring a jobs center to the West Placer prairie and because a jobs center is part of the SACOG Blueprint for growth, the Alliance for Environmental Leadership's Citizen-Initiated Smart Growth Plan (CISGP) does not oppose the job center concept; but instead, enhances it with science supported design.

11-3 cont.

Buffer Zone and Economic Feasibility Comparison

Under the County's SAP/PRSP, low-density single-family housing, the university and its associated housing, a middle school, and an elementary school are proposed to be developed south of a new expressway Placer Parkway, within the one mile "buffer" smell zone associated with the County's dump - aka Materials Recovery Facility (MRF). The entirety of Placer Ranch is a vernal pool ecosystem of 2,000 acres. In the 1990's the County successfully litigated against a developer to protect the "buffer". Now the County is the *project applicant* to reduce the "buffer" to 500 ft. and allow some of the most sensitive population groups to live within it. The CISGP removes housing and schools from the MRF smell "buffer", and only large scale industrial campus will be permitted, in large part because the mitigation fees to the proposed Placer County Conservation Plan are so high, that any other use is economically infeasible. For a point of reference, the PRSP's proposed State University campus in the smell "buffer" would generate $40 million in mitigation fees through the PCCP– more than twice the property value of the 300-acre site.

11-4

The CISGP moves the University to an infill site away from the smell zone and off the vernal pool wetlands, where project feasibility improves, infrastructure is in place and the University will contribute to the day to day life of the innovation ecosystem.

Air Pollution and Greenhouse Gasses Comparison

With the County's SIA/PRSP, at build-out at minimum density, up to 83% of the 9,600 acre site will be parking lots and roads and 18% will structures, according to the average FAR. The proposed public transit consists of a bus stop map that does not have the ridership density to support useful bus service. As a result, public

11-5

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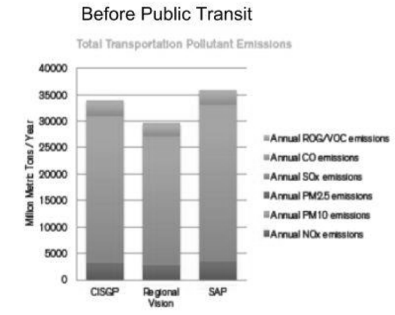
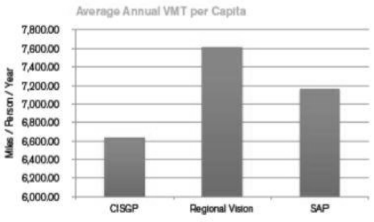
transit will not be utilized by the proposed 100,000 - 150,000 people who would live and/or work in the project area at build-out. With a car dependent population, new daily vehicular trips will exceed 880,000. Annual CO2 generation will exceed 550,000 metric tons.

The CiSGP enables rapid bus public transit by increasing residential densities and improves quality of life and character of place. The CISGP addresses social equity through quality location of all housing. The proximity of workforce housing and daily amenities to employment in the CISGP will reduce household operating costs by $3,000 annually compared with the County's SAP/PRSP. See the Household Cost Report on page 53 of the CISGP for details.

Transit Feasibility

	CISGP	SAP
% of Residents living in minimum required density of 9 du/ac to support Bus Rapid Transit	100%	12%
% of Non-Residential Uses with the minimum FAR of 1.0 required to support Bus Rapid Transit	45%	0%





11-5 cont.

Social Equity and Housing Comparison

Tax payers of all income levels have funded the upfront planning work (to date $6. million) for the County/developers' design, but not all citizens will reap benefits should this project proceed. While most of the estimated 92,000 new jobs

11-6

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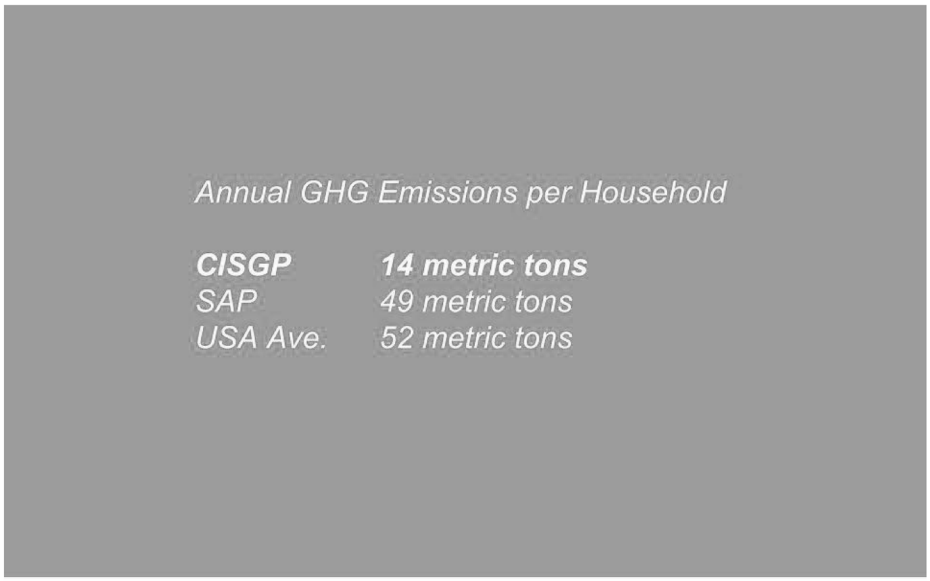
will be occupied by blue-collar, hourly-wage workers, only 600 units of high-density multi-family housing are proposed among the 8,014 total units of which 6,291 are single family sprawl. The SAP Jobs-housing ratio is 22:1.

The CISGP is designed as an innovation ecosystem -providing 49,613 multi-family housing units of various typologies designed so that businesses, students and workers are living and working in proximity for collaboration and quality of life measures. This produces a Jobs housing ratio of 3:1. SACOG's job housing standard is 2:1.

In addition, a higher density of housing dramatically reduces environmental impact per capita:



11-6 cont.

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Percent of Residents in Walking Distance to Amenities

	CISGP	SAP
Park, 10 min.	100%	72%
Schools, 15 min.	89%	17%
Hospitals, 15 min.	89%	23%
Restaurants, 10 min.	100%	30%
Work, 15 min.	100%	9%
Homes within 15 min. of job site	100%	9%
Job sites within 15 min. of a home	61%	38%

11-6 cont.

Natural Systems Comparison

Perhaps most importantly, the County's SAP/PRSP is driven by blocks of property ownership boundaries rather than the dynamic and complex natural features of the land. CISGP design protects and enhances the prairie's natural features and systems where possible through a balance of local and regional conservation. Wildlife corridors, hydrologic dynamics, vernal pool, and agricultural features will all but disappear with the County's SAP/PRSP. Additionally the County's Plan poses a threat to ecosystem values in the four major conservation/mitigation sites located outside but proximate (north) to the SAP - because the headwaters and most of the watershed of these existing conservation properties will be eliminated under the SAP/PRSP and development will increase the edge effect on the reserves. See pages 68-78 of the CISGP for detailed natural system comparisons.

Letter 11	Alliance for Environmental Leadership Leslie Warren, Chair January 24, 2019; February 9, 2019

11-1 The comment asks how the federal government shutdown is affecting federal agencies' ability to provide comments on the Draft EIR. This comment was addressed in an email exchange between the commenter and the County (which is included as part of comment letter 11). While the County was prepared to accept comments from federal agencies provided after the close of the public comment period (in consideration of the federal government shutdown), none were received either during or after the public comment period. CEQA requires a public review period of 45 days for EIRs that require state agency review, which was met and exceeded by the County with the provision of a 64-day review period for the project. There is no basis under CEQA to extend that timeframe due to a federal government shutdown, and most of the information needed to evaluate the project is available online or through state agencies.

11-2 The comment states that the CISGP was developed by the Alliance for Environmental Leadership as an alternative to the proposed project and would meet the County's growth and economic development objectives. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

The comment also refers to the project's significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

The following comments provide a comparison of the CISGP to the proposed project. These comments are comprehensively addressed in Master Response 2: Citizen-Initiated Smart Growth Plan. Therefore, the responses simply cross-reference to that master response.

11-3 The comment makes comparisons between the project and the CISGP. See Master Response 2: Citizen-Initiated Smart Growth Plan.

11-4 The comment makes comparisons between the project and the CISGP. See Master Response 2: Citizen-Initiated Smart Growth Plan.

11-5 The comment makes comparisons between the project and the CISGP. See Master Response 2: Citizen-Initiated Smart Growth Plan.

11-6 The comment makes comparisons between the project and the CISGP. See Master Response 2: Citizen-Initiated Smart Growth Plan.

SHUTE, MIHALY & WEINBERGER LLP

Letter 12

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

SARA A. CLARK
Attorney
Clark@smwlaw.com

February 22, 2019

Via Email and U.S. Mail

Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
Email: sherring@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012)

Dear Ms. Herrington:

This firm represents the Alliance for Environmental Leadership (AEL) in connection with the Sunset Area Plan/Placer Ranch Specific Plan (Project) and its associated Draft Environmental Impact Report (DEIR). AEL seeks to ensure that any development in the Sunset Area protects the site's unique environmental resources, including extensive vernal pool and riparian habitat, and addresses the existing community's needs and concerns.

After carefully reviewing the DEIR for the proposed Project, however, we have concluded that it fails to comply with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq. As described below, the DEIR violates CEQA because it fails to identify *any* alternative that would substantially reduce or eliminate even one of the Project's *sixty* significant and unavoidable impacts. The County cannot ignore its obligation to analyze options to achieve its goals in a more sustainable way. The DEIR also fundamentally errs by failing to consistently and accurately describe the proposed Project. Much of the analysis is based on the assumption that this Project will bring tens of thousands of primary wage earner jobs to the area. But even the County elsewhere acknowledges that these jobs are unlikely to materialize, and the Project's future residents will be stuck commuting significant distances. These false assumptions undermine the integrity of much of the DEIR's analysis. 12-1

AEL has serious concerns about the environmental impacts of the Project, which proposes to convert almost 14 square miles of West Placer farm and prairie lands into a sprawling new development, complete with an employment center/industrial park, a new university, and thousands of units of single-family sprawl. According to the DEIR's own admissions, the Project would result in significant and unavoidable impacts in virtually every impact category (e.g., aesthetics, agricultural resources, air quality, archaeological resources, biological resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, population, employment and housing, transportation, and utilities).[1] DEIR at 2-7 to 2-115. No responsible decisionmaker could conceive of approving a massive development that would result in such severe environmental degradation. Yet, the proposed SAP/PRSP would do just that. AEL urges the County to reject this ill-conceived project.

AEL could potentially support development in this location if the County's proposal would result in a project that promoted smart development, i.e., one that improved the region's jobs/housing imbalance, encouraged a mix of building types and uses, focused on providing housing for those that need it most (including very low, low, and moderate incomes), ensured at least some transit accessibility, reduced vehicle miles traveled (VMT), protected sensitive habitats, and curbed worsening environmental conditions. To that end, AEL has engaged with the community to produce a Citizen-Initiated Smart Growth Plan[2] that fundamentally reimagines future development for the area. As explained below, CEQA requires that the County evaluate this proposed alternative in a revised and recirculated DEIR.

12-1 cont.

Finally, as we explain below, the DEIR fails to meet CEQA's minimum requirements both because it neglects to present all relevant facts relating to the Project's environmental impacts and because its cursory conclusions are not based upon any analysis. The end result is a document which is so crippled by its approach that

[1] The DEIR identifies only two impacts, public services and energy, that could be reduced to a less than significant level. Yet, had the DEIR conducted a legally adequate analysis, it is likely it would have determined that these impacts would also be significant and unavoidable. The Project provides little by way of public services and exacerbates the wasteful use of energy by perpetuating a car-centric development model.

[2] The Smart Growth Plan is submitted under separate cover from AEL, but is incorporated by reference into this comment letter.

decisionmakers and the public are left with no real idea as to the severity and extent of the Project's environmental impacts. 12-1 cont.

I. The County Must Consider the Citizen Initiated Smart Growth Plan in a Revised and Recirculated EIR.

Analysis of alternatives lies at the "core" of an EIR. *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564. CEQA's central mandate is that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1354 (quoting Pub. Resources Code § 21002); CEQA Guidelines § 15126.6(b). Indeed, courts have repeatedly emphasized that the purpose of an EIR includes identification of alternatives to the project. *Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089.

An EIR therefore must analyze a "reasonable range" of alternatives to the proposed project. CEQA Guidelines § 15126.6(a); *Laurel Heights I*, 47 Cal.3d at 404. To be "reasonable," these alternatives must provide enough variation from the proposed project "to allow informed decisionmaking" regarding options that would reduce environmental impacts. *Laurel Heights Neighborhood Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 404-05. Courts have repeatedly invalidated EIRs where, as here, they fail to analyze feasible alternatives that could reduce a project's primary, significant impacts. *See, e.g.*, *Watsonville Pilots*, 183 Cal.App.4th at 1089-90 (EIR deficient for failing to include reduced development alternative that would avoid or lessen growth-related significant impacts); *Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1285, 1305 (invalidating EIR that failed to discuss any feasible alternative that would lessen the project's water supply impact). 12-2

The County has proposed to replace 13.9 square miles of farmland, prairies, vernal pool wetlands, and riparian forests with a massive industrial, retail, residential, and institutional project. Unsurprisingly, the EIR reveals that the Project will result in an utterly staggering number of significant and unavoidable impacts: sixty discrete issues across a wide range of topic areas, including agricultural resources, air quality and public health, biological resources, greenhouse gas emissions, water quality, traffic, and vehicle miles traveled. In this circumstance, CEQA directs the agency to find alternatives that would *reduce at least some* of these significant impacts. CEQA Guidelines § 15126.6(c);

Citizens of Goleta Valley, 52 Cal.3d at 566. And yet, the County shirks this duty, presenting no alternatives that would avoid or substantially reduce *even a single one* of the Project's sixty significant and unavoidable impacts. This is a fundamental and critical flaw that requires the County to restart its CEQA process.

One of the primary modifications that the County must make in its EIR is to consider the Alliance for Environmental Leadership's Citizen-Initiated Smart Growth Plan (Smart Growth Plan) as an alternative to the proposed Project. AEL engaged Genevieve Marsh, a professional architectural designer and planner, to prepare the Smart Growth Plan as a fundamental re-envisioning of how a jobs center could be planned for west Placer County without sacrificing environmental sustainability. The Smart Growth Plan demonstrates that the Board of Supervisors need not sacrifice the public health and well-being of the County's residents across nearly every metric to accommodate job growth. Because the Smart Growth Plan is a feasible alternative that would "substantially lessen the significant environmental effects" of the Project, it must be analyzed in a revised and recirculated EIR. *Berkeley Keep Jets*, 91 Cal.App.4th at 1354.

12-2 cont.

CEQA is clear that an alternative generated by the public must be considered in an EIR if four conditions are met: (1) the EIR fails to include any alternatives that reduce the Project's significant impacts (*Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1285, 1305); (2) the alternative meets most of the project's objectives, so long as such objectives are not artificially narrow (CEQA Guidelines § 15126.6(b); *N. Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 668); (3) the alternative eliminates or substantially reduces at least some of the Project's significant environmental impacts (*Berkeley Keep Jets*, 91 Cal.App.4th at 1354), and (4) the alternative is feasible (*Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 884-85. The Smart Growth Plan qualifies on all criteria.

First, as the EIR acknowledges, none of the County's proposed "alternatives" even come close to eliminating the Project's sixty significant and unavoidable impacts. DEIR at 2-5. Second, the Smart Growth Plan would clearly meet most of the objectives identified by Placer County:

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
Create a unique employment, entertainment, and education center that would provide regional benefit, create primary wage–earner jobs for residents of nearby cities and unincorporated areas, and help to generate revenue to fund countywide services.	The CISGP includes zoning to support a high-employee density, labor-intensive mix of uses, a university and other educational opportunities, and super-regional entertainment venues. It also contributes to the character of place and creates live/work synergism.
Establish and maintain high-quality standards for architectural and aesthetic design that ensure creation and maintenance of value. Project design should integrate amenities that add interest and character, including amenities that take advantage of the Sunset Area's natural and open space features.	The CISGP uses demand trends and changing markets to make wise projections about the design requirements of future occupants. It establishes and maintains high-quality standards for sustainable design and construction, while respecting the dynamics of this unique landscape.
Improve Sunset Area infrastructure with an emphasis on transportation improvements and the extension of public sewer and water to expand the supply of "shovel-ready" sites.	The CISGP focuses on siting compatible uses to take advantage of existing and shared infrastructure and amenities to reduce costs, allowing higher quality amenities and enabling public transportation and walkable communities. It also provides an urban recreation district with large lot industrial campuses.
Streamline the land development review process for CEQA compliance and project entitlements.	Similar to the proposed plan, adoption of the CISGP could be used to streamline the land development review process.
Broaden the range of development opportunities in the Sunset Area, including support for postsecondary education facilities and associated uses	The CISGP includes flexible zoning to allow a broad range of development opportunities, including post-secondary education facilities and associated uses, eco-industrial, high-density industrial

12-2 cont.

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
(e.g., commercial, residential, research) in the PRSP area.	mixed use and industrial campuses, office R&D, light industry, and office industrial.
Transition to a more high-employee density, labor-intensive mix of uses with an emphasis on goods and services focused on innovation and creativity.	The CISGP includes zoning to support a high-employee density, labor-intensive mix of uses, with specific zoning districts for innovation and mixed use and innovation campuses.
Support the provision of housing types not otherwise available locally to accommodate employees of Sunset Area businesses.	Unlike the proposed plan, the CISGP proposes a true diversity of housing types, meeting the needs of all future employees of the plan area while balancing Placer County's achievable housing goals. The CISGP does this by supporting higher and lower density design, townhouses and residential mixed use to achieve a community-experience centric approach.
Preserve the viability of industrial and large-scale manufacturing operations in the Sunset Area.	Located next to Placer Parkway, the large lot innovation campus district supports major employers, manufacturing and industrial campuses connected by a complex network of utility infrastructure, with an emphasis on efficiency within a pedestrian/commuter corridor.
Retain the large supply of large development sites in the Sunset Area by discouraging subdivisions that diminish long-term value and foreclose unique development opportunities.	The CISGP includes this objective, offering large manufacturers and industrial facilities large development sites with an overarching organizational features and sense of place fostering unique development opportunities.

12-2 cont.

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
Protect existing and future development from adverse impacts associated with incompatible uses.	The CISGP locates major industrial and manufacturing campuses in the MRF Buffer and locates housing, schools and light industry and office industrial outside of odor impact areas.
Provide a network of connected bike lanes, shared-use paths and sidewalks to accommodate cycling and walking for both functional and recreational purposes. This includes requiring street designs that balance the needs of motorists, cyclists, and pedestrians and ensuring connectivity with adjacent areas in Lincoln, Rocklin, Roseville, and unincorporated Placer County.	The CISGP would create walkable live/work neighborhoods, promoting both cycling and walking through long winding natural corridors incorporating a variety of public amenities, connecting various zoning districts with recreational and commuter walking and bike paths connected to adjacent Cities and communities.
Prepare a Specific Plan and associated regulatory documents that collectively create a comprehensive development plan for Placer Ranch, which facilitates development in the Sunset Area in a consistent and orderly manner and that assists in accommodating Placer County's share of the region's future population growth.	The CISGP could be implemented through the creation of a specific plan and associated regulatory documents, which will facilitate development in the Sunset Area in a consistent and orderly manner and assists in accommodating Placer County's share of the region's future population growth.
Ensure that development of the Placer Ranch community is designed to function as a stand-alone project that is consistent with the goals and policies of the Sunset Area Plan, and contributes to development in the Sunset Area Plan and adjacent	In the CISGP, Placer Ranch is designed to function as a key element in the County's job center vision, while protecting future residents from adverse impacts from incompatible uses. The CISGP is also designed to improve project feasibility with site-appropriate development, including a university located amidst the

12-2 cont.

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
development areas in Roseville, Rocklin, and Lincoln.	innovation and mixed-use district where it becomes an asset for those on the businesses outside and students inside.
Provide for a mix of residential and employment generating land uses, which at buildout, can feasibly support the development plan including provisions for parks, schools, a university, backbone infrastructure, and other public facilities, as well as the project's planned commercial and employment centers.	The CISGP is designed so that the mix of residential and employment-generating land uses support the necessary infrastructure and public facilities including provisions for parks, schools, a university, backbone infrastructure, and other public facilities, as well as the project's planned commercial and employment centers.
Create business development opportunities that will catalyze the grander vision of creating a large-scale job center in the Sunset Area Plan, which provides land for a new university and supporting employment center, retail, and residential land uses.	The CISGP is specifically designed to foster a range of business development opportunities linked to the university, including office, R&D, retail, manufacturing, and start-ups. Each use is incentivized in high-density mixed-use communities supporting large and small scale and labor-intensive mix of uses. These job-centers exist in synergy with walkable housing options, including mid-rise rise, suburban multi-family and townhomes creating an urban vibe with supported by recreational and commuter walking and bike paths.
Provide 300 +/- acres to California State University system (CSU) for development of a Sacramento State (Sac State) off-campus center in Placer County, which is sized to potentially accommodate up to	The CISGP includes 252 acres slated for university district located within a major jobs center creating a pipeline for student to find jobs and for employers to engage in research. Located outside the MRF Buffer and within an area served by utilities, the university can be established

12-2 cont.

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
30,000 students (25,000 Sac State and 5,000 Sierra College).	with lower infrastructure and utility costs, lower mitigation fees and fewer environmental impacts.
Create a large-scale job center that supports a wide range of employment opportunities, which implements Placer County's vision for the Sunset Area by planning for uses that allow research and development, office, retail and commercial, innovation/technology, and light manufacturing uses.	The CISGP zoning supports a large-scale job center where manufacturing and industrial facilities operate on large campuses, where hundreds or thousands of employees work a wide range of jogs in an urban recreation network with a distinct sense of place for research and development, office, retail, commercial, innovation/technology, and light manufacturing.
Establish a land use framework to create a mixed-use, urban center adjacent to employment centers and the university site, which will provide retail goods, services, and multifamily housing that benefit from proximity to job clusters.	The CISGP has three different zoning districts related to industrial use, town center, light industry, innovation and mixed use, and eco-industrial zone. Each zoning district is designed to promote mixed-use live/work communities or industrial campuses for large scale employment. Employees and entrepreneurs from live-work campus style communities and compact development allow residents live in close proximity to their jobs, retail, and services.
Establish places for construction of a diverse array of housing types including single-family homes in conventional and compact development patterns, townhomes, apartments, lofts, active-adult	The CISGP meets this objective better than the proposed project, as it provides 49,613 diverse, multi-family units, townhomes, apartments, lofts, active-adult housing, dormitories, faculty housing, and housing in mixed-use and residential communities, as opposed to the Project's

12-2 cont.

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
housing, dormitories, faculty housing, and housing in mixed-use buildings.	focus on single-family homes (6,291 units out of 8,014).
Aid the County in achieving a fair share of its obligation to accommodate a percentage of the region's forecasted population growth, as mandated by the California Department of Housing and Community Development and as directed by the Sacramento Council of Governments, including applicable provisions of Senate Bill 812.	The CISGP supports the provision of attractive and underrepresented housing in mixed use neighborhoods. It employs sustainable design standards that apply equally to blue-collar and white-collar working conditions, creating walkable communities. Such communities have the ridership to support quality public transit, reducing household operating costs and sharing public amenities across more people, enabling them to be of higher quality. The CISGP accommodates a fair percentage of the region's forecasted population growth, as mandated by the California Department of Housing and Community Development and as directed by the Sacramento Council of Governments, including applicable provisions of Senate Bill 812.
Ensure that the development plan provides an appropriate balance of land uses to economically support development of community-wide public and civic facilities, including an elementary school, middle school, neighborhood parks, miniparks, and open spaces.	The CISGP includes an appropriate balance of land uses to economically support public and civic facilities, including an elementary school, middle school, neighborhood parks, miniparks, and open spaces. The CISGP's Urban Recreation district is a core component of the community design and contributes many features to the Plan in form and function.
Establish a corridor for the future construction of Placer Parkway, including	Placer Parkway will continue to serve the as the main access point in and out of the

12-2 cont.

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
land areas for roadway interchanges at Foothills Boulevard and Fiddyment Road.	Sunset Area. The CISGP includes land areas for roadway interchanges at Foothills Boulevard and Fiddyment Road.
Create a balanced plan for on-site habitat conservation and development through the creation of open space corridors that will permanently protect sensitive resource areas and drainage ways.	The CISGP better balances on-site habitat conservation and development in a manner that ensures permanent protection of sensitive resources, integrates natural stream courses in the University Campus, and utilizes natural stream headwaters for catchment basins and public recreation features.
Participate in the PCCP to facilitate the permanent preservation of several types of natural resources and biological communities located throughout western Placer County.	The CISGP allows landowners to participate in the PCCP to facilitate permanent preservation of several types of natural resources and biological communities located throughout western Placer County.
Provide land use phasing and public facilities financing plans that enable the Plan Area to develop in an economically feasible manner.	The CISGP can be implemented to ensure that the area is developed in an economically feasible manner because the proposed land uses will reduce public facilities financing costs and expedite development and plan implementation.
Ensure that the development plan creates a balanced community that can be implemented in a fiscally responsible manner, with neutral or positive impacts on Placer County and the provision for revenue sources for the long-term maintenance of open space areas, park	The CISGP creates a balanced community, including residential, industrial, commercial, and educational uses that will generate revenue sufficient to support long term maintenance of open spaces, libraries, park facilities, wildlife corridors, public services and infrastructure.

12-2 cont.

DEIR Stated Objectives	***CISGP's Consistency with County's Objectives***
facilities, landscape corridors, public services, and infrastructure.	
Aid the County in achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat stormwater, and reduce reliance on the automobile.	The CISGP is designed with these measures in mind, rather than relying on after-the-fact mitigation measures to attempt reaching sustainability goals.
Create a development plan that is consistent with the growth principles identified in the Sacramento Area Council of Government's Blueprint, which consists of providing higher-density residential neighborhoods; more compact forms of development; alternative transportation options, such as Bus Rapid Transit and bicycle use; and an interconnected network of residential neighborhoods, commercial nodes, and employment centers.	The CISGP is designed with these principles in mind, including higher-density residential neighborhoods, compact development footprints, and principles to allow public transit and alternative forms of transportation.

12-2 cont.

To the extent the County determines that the Smart Growth Plan is incompatible with any of these objectives—which, as discussed above, is not the case—it may not dismiss the Smart Growth Plan out of hand. The County must consider whether the objective is "artificially narrow" and thus improperly precluding consideration of viable alternatives. *N. Coast Rivers*, 243 Cal.App.4th at 668 (invalidating an EIR because an "artificially narrow" objective precluded consideration of alternatives). And the County must nevertheless consider an alternative that does not meet every single objective, so long as it meets most of them. CEQA Guidelines § 15126.6(b). The Smart Growth Plan plainly meets that standard.

Third, the Smart Growth Plan would eliminate or substantially reduce at least some of the Project's significant environmental impacts. For example:

- The Smart Growth Plan significantly reduces impacts to sensitive vernal pool ecosystems. While the Project allows significant development on these areas, including the 2,000-acre Placer Ranch, the Smart Growth Plan uses science-driven design to avoid these sensitive ecosystems. This change would substantially reduce or eliminate significant biological resource impacts (i.e., Impact 4.4-3, Loss of federally listed vernal pool branchiopods and Western spadefoot; Impact 4.4-7, Conflict with local policies or ordinances protecting biological resources; Cumulative Impact 4.4-12, Contribution to loss of federally listed Vernal pool branchiopods and Western spadefoot). 12-3

- The Smart Growth Plan drastically reduces operational greenhouse gas emissions expected to be generated. Given the Project's low density and lack of relationship between proposed land uses, it is expected to significantly increase greenhouse gas emissions by ensuring future residents will be car-dependent. On the other hand, the Smart Growth Plan is designed to facilitate Bus Rapid Transit and to ensure that future workers on the project site can actually afford to purchase or rent houses nearby. These modifications would substantially reduce or eliminate significant greenhouse gas impacts (i.e., Impact 4.7-2, Operational greenhouse gas emissions). Associated reductions in vehicle miles traveled would also substantially reduce or eliminate the Project's air quality and public health impacts (i.e., Impact 4.3-3, Long-term operational emissions of criteria air pollutants and ozone precursors; Impact 4.3-5, Exposure of sensitive receptors to TACs; Cumulative Impact 4.3-8, Long-term operational emissions of criteria air pollutants and precursors; Cumulative Impact 4.3-10, Exposure of sensitive receptors to TACs). 12-4

- The Smart Growth Plan would eliminate significant odor impacts associated with the Western Regional Sanitary Landfill. The proposed Project places single-family housing, a university and associated housing, a middle school, and an elementary school within one mile of this existing facility; in contrast, the Smart Growth places only large-scale industrial users in this area. This change in use would substantially reduce or 12-5

> eliminate the significant impacts associated with odor and incompatible land uses (i.e., Impact 4.3-6, Create objectionable odors affecting a substantial number of people; Impact 4.10-2, Consistency and compatibility with the Western Regional Sanitary Landfill).

12-5 cont.

The Smart Growth Plan presents additional analysis of the ways in which it reduces the Project's significant and unavoidable significant impacts.

Fourth, the Smart Growth Plan is entirely feasible. To the extent the County concludes otherwise, it must provide substantial evidence to support its conclusion. *See Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 884-85. Such a feasibility analysis is necessary to allow the public and decision-makers to have an open and informed discussion about viable alternatives to the proposed Project. At this time, nothing in the County's DEIR or other documents demonstrates the infeasibility of this alternative.

12-6

II. The DEIR Fails to Adequately Describe the Project.

Under CEQA, the inclusion in the EIR of a clear and comprehensive description of the proposed project is critical to meaningful public review. *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193. The court in *Inyo* explained why a thorough project description is necessary:

> "A curtailed or distorted project description may stultify objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance." [citation omitted] Thus, "[a]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR."

12-7

Here, the description of the Project is inadequate. Perhaps the most egregious deficiency relates to the DEIR's failure to include specific and stable buildout projections. Without clear picture of how the site will be developed over time, it is impossible to make sense of the DEIR's environmental impact analyses.

The DEIR explains that the Project has a development holding capacity that may span over 80 years. DEIR at 3-27. For this reason, according to the DEIR, the County delineated the Project's land use plan into two phases: Phase 1, which is based on estimated market demand for development that could occur within the 20-year plan horizon; and Phase 2, which anticipates remaining land development likely to occur "beyond the 20-year plan horizon." DEIR at 3-27. The problem is that none of the environmental impact analyses, including, for example, air quality, greenhouse gas (GHG) emissions, and transportation, evaluate impacts based on this delineation between development occurring in Phase 1 or Phase 2. It is not at all clear whether these analyses are based on development occurring in two phases, at the same time, or in some other pattern entirely. As a result, the public cannot tell whether the analyses are based on realistic assumptions or overly optimistic ones. CEQA requires more. *Sierra Club v. County of Fresno* [citation] (EIR must include "enough detail 'to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project'").

12-7 cont.

Compounding matters, certain of the environmental impact analyses rely on a buildout year that is not even identified. The air quality analyses and the GHG analyses, for example, identify buildout as occurring "past 2050." *See* DEIR Table 4.3-7: Summary of Maximum Daily Operational Emissions of Criteria Air Pollutants and Precursors at Full Buildout of the Net SAP Area" footnote#1 and DEIR Table 4.7-2: Unmitigated Operational Greenhouse Gas Emissions for Net SAP Area and PRSP at Full Buildout. The traffic analysis takes a different approach altogether as it defines buildout as occurring over "80+ years." DEIR at 4.14-2. Decisionmakers and the public are thus left with a confused, inadequate picture of the Project that the DEIR is actually analyzing. And as discussed below in Section III, the implications of these various approaches to buildout result in impact analyses that are essentially meaningless.

III. The DEIR's Analysis of and Mitigation for the Impacts of the Proposed Project Violate CEQA.

The discussion of a proposed project's environmental impacts is at the core of an EIR. *See* CEQA Guidelines § 15126.2(a) ("[a]n EIR shall identify and focus on the significant environmental effects of the proposed project"). As explained below, the DEIR's environmental impacts analysis is deficient under CEQA because it fails to provide the necessary facts and analysis to allow the County to make informed decisions about the Project. An EIR must effectuate the fundamental purpose of CEQA: to "inform the public and responsible officials of the environmental consequences of their decisions

12-8

before they are made." *Laurel Heights Improvement Ass'n v. Regents of University of California* (1993) 6 Cal.4th 1112, 1123 (*Laurel Heights II*). To do so, an EIR must contain facts and analysis, not just an agency's bare conclusions. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 568. Thus, a conclusion regarding the significance of an environmental impact that is not based on an analysis of the relevant facts fails to fulfill CEQA's informational mandate.

Additionally, an EIR must identify feasible mitigation measures to mitigate significant environmental impacts. CEQA Guidelines § 15126.4; Pub. Res. Code § 21002. This requirement is particularly important where, as here, the EIR identifies many significant environmental impacts. An agency must not simply disclose the environmental harm; it must propose and adopt mechanisms that will actually reduce or eliminate these harms.

12-8 cont.

Although it is clear that the proposed Project has the potential to cause extraordinary environmental degradation, the DEIR provides incomplete and inaccurate information to both the public and the decisionmakers about the likely scope and magnitude of these impacts. As summarized below, the DEIR simply fails to provide detailed, accurate information about the Project's significant environmental impacts and to analyze adequate mitigation measures that would reduce or avoid such impacts. The County cannot proceed with such an inadequate document.

A. The DEIR Fails to Adequately Analyze the Project's Significant Environmental Impacts.

1. The DEIR's Flawed Buildout Projections Creates All Sorts of Analytical Problems.

A review of the environmental impact chapters quickly reveals that the DEIR authors were faced with an impossible task: they must analyze the Project's environmental impacts against a set of vague and fluctuating buildout projections. For example, the Project contemplates a massive increase in employment, an amount far beyond market projections. DEIR at 4.12-10. Yet it is unclear exactly which employment projections were used to evaluate the Project's environmental impacts, including, for example, the Project's increase in vehicle miles traveled (VMT), vehicular energy consumption, mobile source air quality emissions, and GHG emissions.

12-9

Currently Placer County has a low jobs-to-housing ratio, meaning that there are more housing units than jobs in the area. DEIR at 4.12-11. According to the DEIR, the overarching vision of the SAP is to create primary wage–earner jobs for residents of nearby cities and unincorporated areas. DEIR at 3-5. The DEIR states that Project buildout will generate 55,760 new jobs in the SAP and PRSP areas. DEIR at 4.12-10. Notably, the DEIR does not disclose the actual year that the Project would be expected to generate 55,760 jobs. (*See* Table 4.12-7: Project Housing, Population, and Employment at Buildout). As discussed above in Section II of this letter, it is critical that the DEIR clearly delineate its buildout projections for each of the environmental impact analyses.

In direct contrast, the DEIR's population and housing chapter explains that a market analysis prepared in 2015 in support of the Project indicates that the SAP area could only support up to 15,300 jobs by 2035. DEIR at 4.12-8. The DEIR never grapples with this serious discrepancy (i.e., a project that is expected to add 55,760 in a future undefined buildout year and a market analysis showing that the area could only support 15,300 jobs in 2035).[3] If the Project area does not add a sufficient number of jobs to support its future housing levels—which, based on the market analysis, appears likely—the Project would further exacerbate the area's jobs/housing imbalance.

12-9 cont.

[3] The DEIR identifies residential growth projections but fails to provide employment projections. The DEIR explains that the Sacramento Area Council of Governments (SACOG) prepares a land use forecast required to accommodate the regional growth forecast of population, employment, and housing demand. DEIR at 4.12-2. SACOG's 2016 Metropolitan Transportation Plan (MTP) forecasts the amount of growth that will occur in SACOG's plan area over a 20-year planning period (2012–2036). The regional growth forecast is based on economic and demographic projections through 2036, adopted and pending land use plans and policies, market and economic considerations, and other state and federal policies and regulations that can affect the location and pace of growth. As calculated in preparation for the 2016 MTP, the SACOG area is estimated to add more than 800,000 new residents between 2012 and 2036 (Table 4.12-3). DEIR at 4.12-3. In order to accurately evaluate the proposed Project's environmental impacts, the DEIR should have identified the MTP's employment forecasts for this same timeframe. This failure is a serious flaw that must be corrected in a revised DEIR and recirculated for public review.

The County has repeatedly seen that developers, when given the opportunity, will build housing first and the job-creating land uses second, if at all. The adjoining areas are replete with subdivisions where the developer finished the single-family homes but left the commercial and retail centers incomplete. And when current building is compared to the SACOG's Blueprint for Growth, only the single-family homes have been built.

The concept of jobs/housing "balance" is based on the assumption that if a community provides housing proportionate to the number of jobs in the community, the majority of residents would have the opportunity to work and reside in the same community. DEIR at 4.12-5. This balance could result in fewer vehicle trips because of the reduced need to commute in or out of the community for employment opportunities. Fewer commute trips could result in reduced effects on roadways and a lower amount of air pollutant and GHG emissions. *Id.* The lower the jobs/housing ratio, the fewer number of jobs for residents, resulting in workers commuting out of the area. *Id.*

If, as appears evident, the DEIR's environmental impact analyses assumed more jobs than will actually be created, the Project will exacerbate the current jobs/housing imbalance. This means that the Project will result in greater vehicular trip generation—and traffic-related impacts—than the DEIR discloses. In addition, because there will be greater commuting to jobs, the vehicle trip lengths will be greater than the DEIR discloses. This translates to a greater increase in VMT than the DEIR discloses. Because VMT is used to calculate a project's operational mobile source air pollutant emissions and GHG emissions, these emissions will also be much greater than the DEIR currently discloses. Finally, VMT is also used to calculate a project's vehicular fuel consumption. Accordingly, a DEIR that underestimates a project's VMT also necessarily underestimates a project fuel consumption and a project's potential to result in a wasteful and inefficient use of energy.

12-9 cont.

Moreover, even if the County has evidence to support the generation of 55,760 new jobs—which does not appear to be the case based on this record—it also must demonstrate that these jobs will be "primary wage-earner jobs" that will actually allow the employees who work at this site to afford the single-family housing that is slated to be built. Based on the County's plan, however, it appears that the vast majority of the jobs generated by the Project will be blue collar or service jobs; such workers will be unable to afford the Project's expensive single-family homes. Consequently, the County's projections regarding VMT are likely to be severely underestimated, as future job holders will still need to commute significant distances to find less expensive housing.

These are not trivial defects. The DEIR must be revised to identify accurate, reasonable, and *realistic* demographic (population, residential and employment) projections to support the Project's job-housing balance projections, VMT projections, and the associated environmental impacts. If the County truly intends to approve a Project that will build out over an 80+ year horizon, the revised EIR must paint an accurate picture of what West Placer will look like throughout the 80+ year development horizon as a result of the Project and disclose the environmental effects *that will occur throughout this entire development process.* Without conducting this analysis, the DEIR fails to provide substantial evidence to support its conclusions across multiple environmental issues, including air quality and public health, greenhouse gas emissions, traffic, and noise.

12-9 cont.

2. The DEIR Fails to Adequately Analyze the Project's Growth Inducing Impacts.

CEQA requires that an EIR discuss the ways in which a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. CEQA Guidelines § 15126.2d(a). Here, the DEIR acknowledges that the Project would induce growth (DEIR at 2-2; 2-3; 3-7; 5-6; 5-7) and vaguely asserts that this growth would have effects on the environment. DEIR at 4.12-11. In direct violation of CEQA, however, it offers no actual analysis of these impacts. In *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 370, one of the seminal CEQA cases on growth-inducing impacts, the court explained the type of analysis that must be included in an EIR's growth-inducing impact section. In that case, the challenged project created new jobs, thus inducing population growth and necessitating the construction of new housing units. *Id*. at 371. The court explained that the EIR, at a minimum, must (1) "identify the number and types of housing units that persons working within the Project area [could] be anticipated to require," (2) identify "the probable location of those units," and (3) address "whether the identified communities [had] sufficient housing units and sufficient services to accommodate the anticipated increase in population." *Id.* at 370. With such information, the EIR would "warn[] interested persons and governing bodies of the probability" and scope of growth, so that they could proactively prepare for it. *Id.* at 371. This level of analysis is equally warranted if a project proposes more housing than jobs – the EIR must disclose the number and location of commercial, office or industrial jobs that would be required, the probable location of those jobs, and whether sufficient jobs are located in a nearby area. The County must undertake such an analysis here, especially

12-10

after it accurately predicts the region's jobs/housing balance throughout development of the Project. 12-10 cont.

B. The DEIR Fails to Identify Feasible Mitigation for the Project's Significant Environmental Impacts.

The DEIR determines that the Project would result in significant environmental impacts in virtually every impact category. Yet, in certain instances, the DEIR offers no mitigation measures in direct violation of CEQA. Pub. Res. Code § 21002.1. In other instances, the DEIR's mitigation measures are vague, unenforceable, and incapable of lessening the Project's significant impacts. A summary of certain of these deficiencies follows:

- **Conversion of Farmland to Non-Agricultural Use**: The DEIR acknowledges that the Project could result in the total conversion of up to 7,295 acres of Farmland. DEIR at 4.12-13. The DEIR includes a mitigation measure calling for farmland to be preserved at a 1:1 ratio. However, the measure is incomplete, inadequate and unenforceable. Consequently, the DEIR lacks evidentiary support that the measure will effectively reduce farmland-related impacts. First, the measure relies on the Placer County Conservation Plan (PCCP) "at such time as it is adopted."[4] DEIR at 4.12-14. The DEIR never, however, connects the dots as to how the eventual preparation of the PCCP will result in the preservation of Farmland. Second, the mitigation measure relies on a "series of farmland preservation management plans" that will accompany each proposed development project in the SAP and PRSP, but here too, the DEIR fails to describe these plans or explain how their preparation would reduce impacts. *Id*. Finally, the DEIR offers some additional cryptic text that raises more questions than it answers. It asserts that no additional mitigation would be required "as long as a substantial portion (as determined by the planning director in consultation with the County agricultural commissioner) of the mitigation lands acquired is undeveloped." *Id*. The DEIR never defines the term "substantial portion" nor does it explain how a measure that allows some level of development on mitigation lands could constitute mitigation for the Project's impacts. Nor does the DEIR reconcile how 12-11

[4] The County is developing the PCCP as a County-proposed strategy to coordinate and streamline the state and federal natural resources regulatory permitting processes. DEIR at 4.2-12.

this component of the mitigation measure (allowing some portion of mitigation lands to be developed) is consistent with the mitigation measure's goal of preserving farmland at a ratio of 1:1). 12-11 cont.

- **Operational Greenhouse Gas Emissions:** The DEIR relies largely on a carbon offset program to mitigate the Project's massive increase in GHG emissions.[5] DEIR at 4.7-21. The document lacks evidentiary support, however, that this offset program would effectively reduce the Project's emissions.

  As an initial matter, a mitigation measure requiring the purchase of offset credits operates as a kind of mitigation fee. CEQA does not allow mitigation fees unless there is substantial evidence of a functioning, enforceable, and effective implementation program. Courts have found mitigation fees inadequate where the amount to be paid for traffic mitigation was unspecified and not "part of a reasonable, enforceable program" (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1189); where a proposed urban decay mitigation fee contained no cost estimate and no description of how it would be implemented (*Cal. Clean Energy Com. v. City of Woodland* (2014) 225 Cal.App.4th 173, 198); and where there was no specific traffic mitigation plan in place that would be funded by mitigation fees (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1122). As discussed below, the DEIR provides no evidence that the offset program would be enforceable, let alone effective. 12-12

  First, the fees associated with offsets are quite expensive and there is no assurance that future project proponents would be able to afford the fees' high cost. As the DEIR acknowledges, the current cost of offsets range from $8 to $35 per metric ton of CO2e. DEIR at 4.7-21. Thus, in *today's* dollars, assuming all of the Project's operational GHG emissions would require offsets, total costs would

[5] The DEIR identifies that the SAP would generate 373,895 metric tons of CO2e emissions every year at "buildout" while the PRSP would generate 195,014 metric tons of CO2e emissions every year at "buildout." *See* Table 4.7-3: Mitigated Operation-Related Greenhouse Gas Emissions (DEIR p. 4.7-23). Over the 80-year buildout period, the proposed Project would therefor generate nearly *46 million* metric tons of CO2e (373,895 MTCO2e + 195,014 MTCO2e = 568,909 MTCO2e X 80 years = 45,512,720 MT). And once land uses and transportation patterns are locked into place, it has been difficult to significantly reduce greenhouse gas emissions. As a result, emissions are likely to continue after the 80 year build out period as well.

amount to somewhere between $364 million (45,512,720 MTCO2e x 8 = $364,101,760) and nearly $1.6 billion (45,512,720 MTCO2e x $35 = $1,592,945.200). Thus, because the DEIR offers no indication that it would be feasible for project proponents to pay such high costs, the DEIR lacks the evidentiary support that offset fees are a feasible form of mitigation.

Second, even if the project developers could afford to purchase the offsets, the County must ensure that such offsets are effective and enforceable. And here, the DEIR again lacks any evidentiary support that these offsets would meet these criteria. In particular, CAPCOA and CARB, statewide entities that have developed protocol around greenhouse gas emission offsets, require that offsets be:

> (1) real (they represent reductions actually achieved (not based on maximum permit levels));
>
> (2) additional/surplus (they are not already planned or required by regulation or policy (i.e., not double counted);
>
> (3) quantifiable (they are readily accounted for through process information and other reliable data);
>
> (4) enforceable (they are acquired through legally binding commitments/agreements);
>
> (5) validated (they are verified through the accurate means by a reliable third party); and
>
> (6) permanent (they will remain as GHG reductions in perpetuity).

DEIR at 4.7-22. The DEIR offers no indication as to how the County will ensure that the offsets will meet any, let alone all, of these criteria. In fact, the DEIR concedes that because of the long-term buildout of the Project, the availability and affordability of purchasing GHG offset credits in the future is unknown.

While the DEIR correctly concludes that the Project's long-term impact on climate change would be significant and unavoidable, in part because of the uncertainties around offset programs (DEIR at 4.7-23), this statement does not absolve the County of the responsibility of crafting legally adequate mitigation measures. *Berkeley Keep Jets*, 91 Cal.App.4th at 1371 (DEIR may not "travel the legally

12-12 cont.

impermissible easy road to CEQA compliance . . . [by] simply labeling [an] effect 'significant'"). The DEIR must be revised to fix these issues.

Moreover, in circumstances such as this, where the mitigation measures identified by the lead agency are inadequate to reduce an environmental impact to a less-than-significant level, the lead agency must take considerable care to ensure that no other feasible measures are available. *See* CEQA Guidelines § 15126.2. If the public suggests additional measures, they must be carefully scrutinized by the lead agency to ensure that the EIR adopts *all* feasible mitigation to "substantially lessen the significant environmental effect." CEQA Guidelines §§ 15091(a)(1).

Here, the DEIR's primary mitigation measure for the Project's GHG emissions fails to satisfy CEQA's standards. Other measures exist to reduce impacts. To the extent they are not already incorporated into the Project design or proposed as mitigation, the County must consider and adopt additional feasible measures, including those described below. If the County opts to reject any of the following measures, it must support its decision with substantial evidence.

12-12 cont.

1. Transportation and Motor Vehicles

- Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.
- Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.
- Build or fund a transportation center where various public transportation modes intersect.
- Contribute funding to local and regional transit agencies.
- Provide public transit incentives such as free or low-cost monthly transit passes.

2. Energy Efficiency

- Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
- Install light colored "cool" roofs, cool pavements, and strategically placed shade trees.
- Provide information on energy management services for large energy users.
- Install energy efficient heating and cooling systems, appliances and equipment, and control systems.
- Install light emitting diodes (LEDs) for traffic, street and other outdoor lighting.
- Limit the hours of operation of outdoor lighting.
- Provide education on energy efficiency.

12-12 cont.

3. Renewable Energy

- Install energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives.
- Use combined heat and power in appropriate applications.

4. Water Conservation and Efficiency

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- Design buildings to be water-efficient. Install water-efficient fixtures and appliances.

- Restrict the use of water for cleaning outdoor surfaces and vehicles.

- Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.

12-12 cont.

Given the massive greenhouse gas emissions expected to be generated by this Project, CEQA requires the County to look carefully at all possible mechanisms to reduce them. Ultimately, these mechanisms may be little more than band aids on a fundamentally ill-conceived Project. To realistically address the existential threat posed by climate change, AEL urges the County to reconsider the nature of development on this site, including by given thorough consideration to the Smart Growth Plan. *See* Section I, *supra*.

- **Population Growth From New Homes and Buildings:** The DEIR acknowledges that buildout of the net SAP and PRSP areas would result in 8,094 new dwelling units for a population growth of 19,314 new residents. DEIR at 4.12-10. Additionally, buildout of the net SAP and PRSP areas would generate 55,760 new jobs in the project area. *Id*. The DEIR determines that this increase in growth constitutes a significant impact. *Id*. The document errs, however, as it fails to include *any* mitigation for this significant impact. DEIR at 4.12-12. The DEIR concedes that growth-related impacts could be avoided or reduced by not taking a certain action or parts of an action, yet it rejects this approach claiming that the Project would not meet its own objectives (e.g., to provide opportunities for economic innovation, offer housing diversity, improve the jobs-housing balance, catalyze development, establish a major employment center, etc.). *Id.* The end result is a document that offers no mitigation at all for the Project's significant impacts relating to population growth; this approach is in direct violation of CEQA. *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61, 79. Certainly, the County could consider a mitigation measure that reduces those components of the Project that will result in excessive population growth, i.e., it could reduce the amount of housing.

12-13

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IV. The DEIR Must Be Recirculated.

Under California law, this DEIR cannot properly form the basis of a final EIR. CEQA and the CEQA Guidelines describe the circumstances that require recirculation of a draft EIR. Such circumstances include: (1) the addition of significant new information to the EIR after public notice is given of the availability of the DEIR but before certification, or (2) the draft EIR is so "fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." CEQA Guidelines § 15088.5.

Here, both circumstances apply. Decisionmakers and the public cannot possibly assess the Project's impacts through the present DEIR, which is riddled with errors. Among other deficiencies, the DEIR relies on unsupported assumptions—particularly around job growth and housing—that fundamentally undercut its analysis of significant environmental impacts. The DEIR's Project Description is so unstable and uncertain that meaningful review of the Project's environmental impacts is essentially impossible. And the DEIR fails to come up with any alternative that would actually reduce the Project' astounding number of significant and unmitigable impacts, even though the development of such alternatives is critical to allowing the public and decisionmakers understand the tradeoffs associated with developing the site. In order to resolve these issues, the County must prepare a revised EIR that would necessarily include substantial new information. 12-14

V. Conclusion

As set forth above, the DEIR suffers from numerous deficiencies, many of which would independently render it inadequate under CEQA. As a result, the County cannot proceed to preparing an FEIR and approving the Project at this time.

Instead, given the fundamental flaws with both the DEIR and the underlying Project, the County must pause and reconsider its approach to this site. Specifically, we urge the County to assess both the environmental impacts and feasibility of AEL's Citizen-Initiated Smart Growth Plan, which has been seriously and thoughtfully designed to achieve the best result for the public consistent with CEQA and the special circumstances of this unique site. The Smart Growth Plan demonstrates that residents of Placer County need not sacrifice the environment in order to attract good-paying jobs and affordable housing. CEQA mandates that the County thoroughly evaluate this approach. 12-15

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Thank you for your consideration. Should you have any questions about this letter, please do not hesitate to contact me.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Sara A. Clark, Esq.
Laurel L. Impett, AICP, Urban Planner

cc: Leslie Warren, Chair, AEL (via email: allianceforenviroleadership@gmail.com)

SHUTE, MIHALY & WEINBERGER LLP

Letter 12	Alliance for Environmental Leadership Sara A. Clark, Esq., and Laurel L. Impett, AICP, Urban Planner, Shute Mihaly & Weinberger LLP February 22, 2019

12-1 The comment states that the Draft EIR does not identify an alternative that would substantially reduce or eliminate the project's significant and unavoidable impacts. Further, the comment states that the Draft EIR does not consistently and accurately describe the proposed project. See responses below regarding the specific comments in this letter. Also, see Master Response 1: Alternatives Analysis and Master Response 7: Program- vs. Project-Level Analysis.

The comment also refers to the project's significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

Regarding the suggestion that the County evaluate the CISGP in a revised and recirculated Draft EIR, see Master Response 2: Citizen-Initiated Smart Growth Plan and Master Response 8: Recirculation. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

The remainder of the comment states that the Draft EIR does not present all relevant facts relating to the project's impacts and the impact conclusions are not based on analysis. See responses below regarding the specific comments in this letter.

12-2 The comment summarizes the CEQA requirements for alternatives, including the need to include a reasonable range of alternatives that would avoid or lessen the project's significant impacts. Master Response 1: Alternatives Analysis explains in detail how the Draft EIR's alternatives analysis is adequate pursuant to CEQA. See response to comment 12-1 and Master Response 2: Citizen-Initiated Smart Growth Plan regarding review of the CISGP as an alternative. It should be noted that Chapter 6 of the Draft EIR has been clarified to reflect the conclusions about each alternative substantially reducing a significant impact of the proposed project. These changes are identified in Chapter 2, "Revisions to the Draft EIR."

12-3 The comment states the CISGP would substantially reduce or eliminate significant impacts on federally listed vernal pool branchiopods and western spadefoot but the plan would still result in substantial loss of vernal pool habitat that supports these species so impacts would remain and would still contribute considerably to a significant cumulative impact on these species. The comment also suggests that the project conflicts with local policies or ordinances protecting biological resources but does not specify how the project conflicts or how the CISGP would eliminate those conflicts. No response can be formulated. The vernal pool comparison maps provided in the CISGP (pages 106 through 109) do not accurately represent the classification of vernal pool density per the PCCP, the map on page 106 does not show the correct geographical location of the SAP area, and there is no explanation about the methodology used to determine vernal pool density in the CISGP map except to say it was from a study by Carol Witham, John Vollmar, and John Schweitzer; a full reference is not provided or even a citation that includes a date. The distribution of vernal pools and other aquatic habitats within the PRSP area was delineated in the field according to U.S. Army Corps of Engineers (USACE) methodologies and verified and concurred with by USACE on March 25, 2015 (USACE 2015).

The CISGP reports that implementing the CISGP would result in between 2,942 and 3,753 acres of direct loss of vernal pool habitat while implementing the SAP would result in between 3,515 and

3,923 acres of direct loss. However, this comparison does not provide a breakdown of impacts on high density versus low density vernal pool complexes and does not allow for a comparison of loss of actual vernal pool wetlands because it is not based on wetland delineation data. Furthermore, while the CISGP might reduce the loss of acreage of vernal pool habitat, the loss of between 2,942 and 3,753 acres of vernal pool complex from the Western Placer Core Area would still be a significant impact and the issues would still exist regarding the availability of existing mitigation credits of sufficient land available from willing sellers to fully mitigate the loss of wetland functions, especially within the Western Placer Core Area (as described on page 4.4-48 of the Draft EIR). Therefore, the impact conclusions would remain significant and unavoidable under the CISGP for the same reasons as for the proposed project. These reasons are stated under the "Significance after Mitigation" headings on pages 4.4-41 and 4.4-48 of the Draft EIR.

Also, see Master Response 2: Citizen-Initiated Smart Growth Plan.

12-4 The comment incorrectly claims that the CISGP reduces the operational GHG emissions associated with the project. As shown on page 47 of the CISGP, the estimated annual operational GHG emissions would be 2,176,091 $MTCO_2e$ while the Draft EIR estimates operational GHG emissions to be 2,035,936 $MTCO_2e$ per year. The comment suggests that implementation of a BRT system that is suggested under the CISGP would substantially reduce or eliminate significant GHG impacts. However, as explained on page 64 of the CISGP, the public transit component of the plan is not included in the vehicle miles traveled or transportation-generated GHG emissions estimates. Thus, this comment's claim that BRT would reduce GHG and criteria air pollutant emissions to a less than significant level is unsubstantiated. See Master Response 2: Citizen-Initiated Smart Growth Plan for additional information.

12-5 The comment suggests that the CISGP would eliminate significant impacts related to odors associated with the WRSL. See response to comment 12-1 and Master Response 2: Citizen-Initiated Smart Growth Plan.

12-6 The comment notes that the Smart Growth Plan (the CISGP), which was submitted as an alternative plan with Draft EIR comments from AEL, is feasible. The comment goes on to state that the County is responsible for preparing a feasibility analysis for viable alternatives to the project. As noted in the comment, the CISGP was submitted by AEL as part of AEL's comments on the Draft EIR, which was released in December 2018. To that end, the County was not in receipt of the CISGP when preparing the Draft EIR. Therefore, it was not possible to provide a feasibility analysis for such an alternative in the Draft EIR. However, for further discussion of the CISGP feasibility, see response to comment 12-1 and Master Response 2: Citizen-Initiated Smart Growth Plan.

12-7 The comment states that the project description is inadequate because it does not include specific and stable buildout projections. The comment suggests there is a lack of clarity regarding specific phases and buildout years. Chapter 3, "Project Description," of the Draft EIR clearly identifies the phases and buildout assumptions. Page 3-27 indicates that, based on market analysis findings regarding absorption, the project has a development holding capacity that may span over 80 years. Thus, the updated land use plan was delineated into two phases: Phase 1, which is based on estimated market demand for development that could occur within the 20-year plan horizon; and Phase 2, which anticipates remaining land development likely to occur beyond the 20-year plan horizon. Draft EIR Table 3-3 shows the development anticipated to occur within the first 20 years (including full build-out of the PRSP area). The comment indicates it is unclear whether development occurring in the two phases would occur at the same time, or in some other pattern entirely. However, the phases are, by definition, sequential because they are chronologically based—before 20 years and after 20 years—and it is therefore clear that the phases would not occur simultaneously.

The comment also suggests that the Draft EIR's environmental analysis did not evaluate impacts "based on this delineation between development occurring in Phase 1 or Phase 2." The Draft EIR's analysis focused on the impacts of the project as a whole and included a breakdown of the various project elements, including the net SAP area, the PRSP area, and other supporting infrastructure. The Draft EIR considered the development timing of each of these elements. However, the Draft EIR, for the most part, did not further subdivide the impact analysis according to phase. The exception is the traffic section.

See, also, responses to comments 12-8 through 12-13, below, regarding how the buildout projections relate to the Draft EIR impact analysis.

12-8 The comment states that the Draft EIR is inadequate because it does not provide the necessary facts and analysis to allow the County to make informed decisions about the project. The comment provides a summary of detailed comments provided below. See responses to comments 12-9 through 12-13, below.

12-9 The comment states that the Draft EIR does not indicate the year the project would be expected to generate 55,760 jobs. The comment suggests that the Draft EIR should have utilized the employment forecasts from SACOG's 2016 MTP. The comment also suggests that the project's VMT could increase if the project would exacerbate the current jobs/housing imbalance. The comment suggests that the EIR include evidence to support the generation of 55,760 new jobs and that these jobs would be primary wage-earner jobs.

The market analysis was prepared by EPS in 2015, prior to completion of the preferred land use alternative for the SAP. The market analysis, which lacked the benefit of having a detailed plan, indicated that the net SAP area could generate as many as 15,300 jobs over a 20-year period. As stated in the Draft EIR (page 4.12-10), following preparation of the net SAP preferred land use alternative, additional analysis was conducted that indicates that the net SAP area could generate up to 40,804 jobs at buildout (calculated by applying commonly-used rates of the number of employees per square foot or acre of non-residential development). This new analysis was based on the plan details that were not available in 2015. It is important to note that this more recent jobs number is based on net SAP area buildout, which, as explained throughout the Draft EIR, buildout of the net SAP area is expected to take over 80 years, whereas the previous jobs projection was based on a 20-year scenario.

Given that the Draft EIR identifies a jobs projection of 40,804 within the net SAP area, and a jobs projection of 14,804 within the PRSP area, the jobs projection for the entire project area (net SAP area plus PRSP area) is 55,760. This is clearly shown in Table 4.12-7 of the Draft EIR. Also, as explained in Chapter 3, "Project Description," and throughout the Draft EIR, the buildout estimate for the PRSP is 20 years (Draft EIR, page 3-27), and, as mentioned above, the buildout estimate for the net SAP area is over 80 years (Draft EIR, page 3-27). The concept of buildout timing does not require further clarification in the Draft EIR.

The commenter's suggestion that the proposed jobs-to-housing ratio might be inaccurate based on historical patterns of homes being developed prior to employment-related development is conjecture. The commenter's assertion that the County must provide evidence that these jobs would be "primary wage-earner jobs" is false; however, the evidence exists in the land use types allowed within both the net SAP area and the PRSP area and the fact that one of the primary objectives of the SAP is to create primary wage-earner jobs for nearby residents.

The methods used for analysis of VMT are provided on page 4.14-21 of the Draft EIR. The analysis uses the SACOG SACMET travel forecasting model as well as the Placer County travel forecasting model to estimate VMT. The travel forecasting model is divided into travel analysis zones to represent specific geographic areas in the SACOG region. This study reports the VMT generated by the travel analysis zones that correspond to the project. The VMT presented in the Draft EIR is a "full

accounting" of the trips to and from the project, tracking the lengths of trips from their origin to their destination. It does not include any trips that only pass through the SAP area or do not start or end in the SAP area (external-to-external trips).

See response to comment 12-7 for a discussion regarding the phasing and buildout projections used in the Draft EIR. Regarding the level of detail for the 80-year buildout scenario, because planning documents in the region rarely use planning horizons beyond 20 years, the 80-year cumulative scenario cannot be as detailed as the 20-year scenario. The Draft EIR traffic section (page 4.14-2) perhaps describes this best:

> Since buildout of the SAP is anticipated to occur over an extended time period (i.e., 80+ years) based on current market forecasts, the current travel models with their 20-year horizons are not equipped to accurately forecast detailed traffic conditions associated with an 80+ year buildout timeframe. Therefore, this scenario is evaluated at a lesser level of detail, consistent with §15130(b) of the CEQA Guidelines, in recognition of the higher level of uncertainty associated with this level of development and a timeframe that would occur well beyond 20 years. This scenario is intended to describe the overall cumulative travel effects of the buildout of the SAP using trip generation and ADT forecasts to provide a cumulative impact analysis.

12-10 The comment suggests that the *Napa Citizens* case requires the EIR to provide additional information regarding the number, types, and location of housing for employees and address whether the community has sufficient housing units and services to accommodate the increased population. The commenter then inverts the cited information from the *Napa Citizens* case suggesting that the Draft EIR should speculate regarding the "number and location of commercial, office, or industrial jobs that would be required" and "whether sufficient jobs are located in a nearby area." The Draft EIR includes sufficient detail regarding population growth. Impact 4.12-1 evaluates project-related impacts associated with population growth from new homes and businesses. This impact includes a discussion of jobs-to-housing balance and demonstrates that the project would help bring the region closer to an ideal jobs-to-housing balance (Draft EIR, page 4.12-11). However, the Draft EIR also discloses that while population growth itself would not create environmental impacts, the physical actions taken to support the population growth would have effects on the environment. The Draft EIR ultimately concludes that the population growth would result in a significant and unavoidable impacts and that the only mitigation would be to reduce the level of development; however, doing so would fail to meet the County's objectives to provide opportunities for economic innovation, offer housing diversity, improve the jobs-housing balance, catalyze development, establish a major employment center, and other objectives (See Chapter 3, "Project Description," Subsection 3.4.1, "Sunset Area Plan Objectives," and Subsection 3.4.2, "Placer Ranch Specific Plan Objectives").

The Draft EIR also evaluates potential impacts associated with growth inducement in Chapter 5. In this analysis the Draft EIR (page 5-5) examines potential for elimination of obstacles to growth and stimulation of economic activity. This analysis concludes (page 5-6) that, although economic and employment growth in the project area is an intended consequence of the project, growth inducement directly and indirectly by the project also could affect the greater Sacramento region. Potential effects caused by induced growth in the region could include loss of agricultural land and open space, alteration of views, increases in light and glare, increases in surface runoff, environmental impacts attributable to increases in regional water use, impacts on surface water quality, aquatic resource impacts, removal of habitat for species federally or state listed and other special-status species, loss of cultural resources, transportation and roadway impacts leading to increased congestion, air quality impacts, increases in GHG emission, increases in noise, increases in population, and increases in demand for public services and utilities. Specifically, an increase in housing demand in the greater Sacramento region could cause significant environmental impacts because new residential development would require additional governmental services, such as

schools, libraries, and parks. Indirect and induced employment and population growth would further contribute to the loss of open space because it would encourage conversion of land to urban uses for housing, commercial space, and infrastructure.

As described above, the Draft EIR includes sufficient detail regarding impacts associated with growth inducement. Revisions to the Draft EIR are not needed.

12-11 The comment states that Mitigation Measures 4.2-1a and 4.2-1b is incomplete, inadequate, and unenforceable. Specifically, the comment suggests that the mitigation lacks evidentiary support. It also suggests that the mitigation "relies" on the PCCP and that it does not "connect the dots" regarding how the PCCP would result in preservation of farmland. However, Mitigation Measure 4.2-1a does not "rely" on the PCCP. The mitigation clearly identifies the PCCP as one potential option for preserving farmland. Also, regarding evidentiary support, Mitigation Measure 4.2-1a includes a clear performance standard (page 4.2-14) for the preservation of converted Farmland and applies to lands preserved under the PCCP or other land preserved due to habitat mitigation:

> No additional mitigation to address the loss of Farmland is required, as long as a substantial portion (as determined by the planning director in consultation with the County agricultural commissioner) of the mitigation lands acquired is undeveloped. Such lands must also have an NRCS soils classification or DOC categorization of the same or greater value than Farmland converted to nonagricultural uses. Mitigation lands will be protected by agricultural conservation easements containing restrictive encumbrances in a form deemed acceptable to and approved by the County. Farmland preserved for the purpose of habitat mitigation may be counted toward the Farmland mitigation measure if the preserved land has the same or better NRCS or DOC classification as the Farmland being converted to nonagricultural use.

The Draft EIR provides clear performance standards for Farmland mitigation; however, the Draft EIR does not suggest that this mitigation fully mitigates the impact to Farmland. The Draft EIR states (page 4.2-14) that, although the conservation easements identified for Mitigation Measures 4.2-1a and 4.2-1b could partially offset the direct conversion of Farmland in the project area, this approach would not create new Farmland to replace Farmland that would be lost, and no additional mitigation is feasible. Therefore, concludes the Draft EIR, the impact would be significant and unavoidable.

12-12 The comment incorrectly estimates the amount of carbon offset credits that would be needed by the project. The comment claims that the net SAP area would need to offset its estimated annual GHG emissions of 373,895 $MTCO_2e$ for 80 years and that the PRSP area would need to offset its estimated annual GHG emissions of 195,014 $MTCO_2e$ for 80 years at "buildout." The term "buildout" of the project refers to the scenario in which all planned development under the SAP is constructed and operational. Because the net SAP area would be built out over 80 years, the operational emissions (i.e., 373,895 $MTCO_2e$/year) associated with buildout would occur in the year 2100. Because data is not available beyond 2050, the Draft EIR conservatively estimates that the project would be fully built out by 2050. This means the Draft EIR's GHG analysis assumed more GHG-intensive development would occur than what would be expected in actuality because of anticipated legislative actions that would reduce GHG emissions from various emissions sources. The comment suggests that the total operational GHG emissions associated with the net SAP area would be multiplied by an 80-year period. This is not how offset costs are calculated by PCAPCD.

The PCAPCD has an adopted policy titled "Review of Land Use Projects under CEQA Policy" that determines how GHG emissions should be offset by the lead agency. If the GHG offset measure is included in the Draft EIR as a feasible measure, "the anticipated emission reduction shall be calculated based on the amount of emissions exceeding the thresholds for one year" (PCAPCD 2017). As explained on page 4.7-22 of the Draft EIR, the amount of GHG emissions that would need to be offset by the net SAP area and by the PRSP area is the amount of GHG emissions exceeding the 1,100 $MTCO_2e$/year threshold for one year, not 80 years as is suggested in the comment. This amount of GHG emissions is considered to be conservative as explained above. Because carbon

offset credits must meet the requirements of permanent as defined in Mitigation Measure 4.7-2b of Draft EIR, these credits would continue to offset the project's annual operational emissions in perpetuity.

The comment also suggests that the use of carbon offsets does not qualify as a CEQA mitigation measure unless there is substantial evidence of a functioning, enforceable, and effective implementation program. Substantial evidence of the validity of the offset credits would be required to be submitted for County approval prior to final map recordation or building permit issuance. As discussed on page 4.7-22 of the Draft EIR under Mitigation Measure 4.7-2b, all carbon offset credits must meet the following requirements:

- **Real**—They represent reductions actually achieved (not based on maximum permit levels).
- **Additional/surplus**—They are not already planned or required by regulation or policy (i.e., not double counted).
- **Quantifiable**—They are readily accounted for through process information and other reliable data.
- **Enforceable**—They are acquired through legally binding commitments/agreements.
- **Validated**—They are verified through the accurate means by a reliable third party.
- **Permanent**—They will remain as GHG reductions in perpetuity.

Based on PCAPCD policy, project applicants would be required to offset the annual operational GHG emissions associated with the project. The credits to offset this amount of emissions is required to be permanent and continue to offset the project's annual operational emissions in perpetuity. Therefore, because the credits offset emissions in perpetuity, each credit already accounts for long-term emission, and factoring in project buildout would result in substantial excess of credits needed to mitigate the project impacts. The amount of carbon offset credits required by the Draft EIR is considered feasible, both based on cost and availability.

Additionally, the comment points out that because of the long-term buildout of the project, the availability and affordability of future offset credits is unknown. The comment correctly summarizes this point, and for this reason, the impact is considered significant and unavoidable.

The comment references the court case, *Berkeley Keep Jets*, 91 Cal.App.4th at 1371, indicating that a significance conclusion does not absolve the County from the responsibility of crafting legally adequate mitigation measures. The facts of the *Berkeley Keep Jets* case are not similar to and cannot be appropriately applied to the Draft EIR's GHG analysis. In the *Berkeley Keep Jets* case, the Port of Oakland did not follow the resource agency's recommendations to follow standard protocols for conducting health risk assessment, and concluded the impact was significant without conducting a thorough analysis. The GHG analysis conducted for the SAP/PRSP project is thorough and follows standard analytic methods. It identifies detailed mitigation measures to reduce GHG emissions. The mere fact the Draft EIR discloses some uncertainty associated with fee payments and conservatively concludes that the impact is significant is not evidence that the Draft EIR did not conduct a thorough analysis and/or identify all feasible mitigation measures.

For the comment regarding additional GHG mitigation measures, see Master Response 5: Greenhouse Gas Mitigation.

12-13 The comment suggests that the EIR must include mitigation for the significant impact related to population growth, including a measure that reduces components that would result in population growth. See response to comment 12-10 for information on the Draft EIR's conclusion that mitigation is not available to reduce impacts related to population growth. The commenter

recommends reducing components of the project to reduce growth-related impacts. The Alternatives section includes several alternatives to the project that are designed specifically to reduce environmental impacts, including those associated with growth. See specifically Alternative 3: Reduced Footprint, Reduced Development Potential (Draft EIR, page 16). In addition to removing almost 1,500 acres out of development, this alternative would result in nearly 30 percent fewer single-family residential units and over 40 percent fewer multifamily residential units. Retail would not substantially change; however, office floor area would be reduced by nearly 40 percent, industrial floor area by nearly 30 percent, and Entertainment Mixed-Use by nearly 25 percent. However, the Draft EIR's alternatives analysis concludes that Alternative 3 would still result in substantial population and employment growth in the area, and although the impact would be less than under the project, it would still be significant.

12-14 The comment states that the Draft EIR is deficient, necessitating a revision and recirculation of the Draft EIR. This comment essentially suggests recirculation is required for the reasons specified in comments 12-1 through 12-13. Therefore, for the reasons discussed under responses to comments 12-1 through 12-13, the analysis is adequate and no changes to the Draft EIR are necessary in response to this comment. Also, see Master Response 8: Recirculation, which explains in detail CEQA's criteria for recirculating a Draft EIR and why recirculation is not necessary for the Draft EIR.

12-15 The comment states that the Draft EIR is deficient and the County cannot, therefore, prepare a Final EIR or approve the project at this time. However, for the reasons discussed under responses to comments 12-1 through 12-14, the analysis is adequate and no changes to the Draft EIR are necessary in response to this comment. See Master Response 1: Alternatives Analysis and Master Response 2: Citizen-Initiated Smart Growth Plan.

LAW OFFICE OF
MARCUS J. LO DUCA
A Professional Corporation

Letter 13

MARCUS J. LO DUCA

February 22, 2019

Ms. Shirlee Herrington
Environmental Coordination Services
County of Placer
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

Re: Draft Environmental Impact Report for the Sunset Area Plan and Placer Ranch Specific Plan (State Clearinghouse Number 2016112012)

Dear Ms. Herrington:

This office represents Brookfield Sunset, LLC ("Brookfield"), developer of the Amoruso Ranch Specific Plan ("ARSP") in the City of Roseville, immediately adjacent to the western boundary of the proposed Placer Ranch Specific Plan ("PRSP"). For nearly the past 20 years, Brookfield has worked with the PRSP property owner, or various applicants working on behalf of that property owner, as the two specific plan areas were working their way through the entitlement process. That collaboration has covered a broad range of areas, from roadway connections, to utility connections and infrastructure sizing, and to major regional infrastructure facilities such as the alignment of Placer Parkway. In fact, the significant work that Brookfield did nearly a decade ago with various federal and state resource agencies on the preferred alignment for Placer Parkway through the ARSP helped define a sharply reduced cross-section of such roadway through the PRSP, benefitting both the PRSP and the Sunset Area Plan as a whole.

Brookfield has cooperated with the PRSP property owner and various applicants in an effort to make the transition from one plan area to the other relatively seamless for residents, employees and visitors of both plan areas, while not burdening one plan area with the impacts of the other. Brookfield submits these comments herein in an effort to

3200 DOUGLAS BOULEVARD, SUITE 300 • ROSEVILLE, CA 95661
TEL (916) 774-1636 • FAX (916) 774-1646
www.loducalaw.com

seek clarification or to make sure the analysis in the above-referenced DEIR adequately covers the topics being studied as they might pertain to impacts to the ARSP.

Chapter 3 – Project Description

1. Page 3-58, PRSP Drainage System, second paragraph: The wording "Although the 200-year, 24-hour event would not be attenuated" does not appear to be correct and is not consistent with the Storm Drainage Master Plan for the PRSP.
2. Page 3-60, PRSP Drainage System, last paragraph in section: Would the relocation of the 10.9 acre-feet of retention capacity associated with the Nichols Drive Industrial Park have any impact on peak flows in University Creek, which crosses through the ARSP? It is not clear that this impact was addressed in the hydrology analysis in the DEIR.

13-1

Chapter 4.9 – Hydrology and Water Quality

1. Page 4.9-26, Impacts and Mitigation Measures: One potentially significant hydrologic impact that implementation of the PRSP could have on University Creek would be an increase in the duration of low flows. Low flows would be expected to increase due to increases in impervious area and also from irrigation and other non-storm water flows into drainage systems. These flows could promote excessive vegetation in University Creek which could reduce capacity for conveyance and thereby increase flooding at higher flows. Another potential impact would be increase in the duration of moderate flows that could induce erosion in University Creek. These potential impacts need to be analyzed. As a general comment, it is unclear what, if any, changes in flows/durations occur from development of the PRSP, and how such changes will impact downstream properties as a result of PRSP development.
2. Pages 4.9-42, -43, Mitigation Measure 4.9-4c, second paragraph: The text moves from matching pre-project conditions to peak flows from a discrete storm event, rather than continuous simulation, which transition can be confusing.

13-2

Chapter 4.14 – Transportation and Circulation

1. Pages 4.14-94, -121, Transportation Inputs, Cumulative Impacts to Intersection Operations in Roseville: The PRSP and approved ARSP traffic studies appear to

13-3

use the same intersection lane geometrics for the ARSP area. However, there are some possible inconsistencies between the traffic studies for the two plan areas, as while both assume Road B in the ARSP is a 4-lane roadway where it intersects with Road A in the ARSP, the volumes modeled at this intersection in the PRSP traffic study are very small (sometimes zero), and do not appear to match or justify the number of lanes that have been projected for Road B. Specifically, Roads B and D are 4-lane roadways in the ARSP, but only 2 lanes immediately to the east in the PRSP. Nowhere in the DEIR is there discussed where the transition between 2 and 4 lane roadways will occur. Included in such a discussion should be how landscape easements in the ARSP, as well as how Class 1A sidewalks in the ARSP, will transition to the 2-lane roadway cross-sections in the PRSP. 13-3 cont.

Chapter 4.15 – Utilities

1. Pages 4.15-64, -65, Cumulative Impacts 4.15-12, 4.15-13, Appendix F, Figure 4-1: The PRSP water system layout proposes 12-inch connections (interties) with the City of Roseville system within the ARSP. The two emergency intertie connections occur at Road B and Road D in the ARSP. Both of these proposed connection points are currently proposed as 24-inch water transmission mains within the ARSP. The discrepancy in pipe sizes needs to be explained in the DEIR. 13-4
2. Page 4.15-51, Mitigation Measure 4.15-4b: The text says in the significance determination paragraph after mitigation that "the capacity expansion [for the PGWWTP] would be required prior to construction [sic] of development within the net SAP and PRSP areas." The question left unanswered is what happens to additional capacity from expansion of the PGWWTP that other projects are financing. Does the PRSP get to utilize expanded capacity that others have paid for to serve their own projects when the PRSP goes to develop if the PRSP has not paid its fair share of the expansion needed to serve the PRSP? 13-5
3. Page 4.15-52, Impact 4.15-5, Construction of Stormwater Drainage Improvements: It is not clear what the impact on other projects relying on Reason Farms would be from the infrastructure that the PRSP needs to mitigate its impacts. 13-6
4. Appendix F, Page 3.3-16: The proposed PRSP water reliability and emergency interties to the City of Roseville system are proposed to include the following at 13-7

each connection: bidirectional water, isolation valves, and telemetry to both PCWA and the City of Roseville. It should be clearly stated that these interties will be located in the PRSP. In addition, there is a pressure differential that occurs in these location of approximately 13 psi under maximum day conditions (lower pressure on the Roseville side), and varies under other scenarios. Thus, a pressure regulating/sustaining valve may be required and should be determined during system design. Intertie design should be reviewed and approved by the City of Roseville as well as by Placer County.

13-7 cont.

We hope that the County finds these comments helpful. Thank you for the opportunity to comment.

Very truly yours,

LAW OFFICE OF MARCUS J. LO DUCA
A Professional Corporation

Marcus J. Lo Duca

Cc: Brookfield Sunset, LLC

Letter 13	Brookfield Sunset, LLC Marcus J. Lo Duca, Law Office of Marcus J. Lo Duca February 22, 2019

13-1 The comment states that a portion of the project description is inconsistent with the PRSP Storm Drainage Master Plan and that potential impacts associated with relocation of an existing on-site detention facility were not evaluated. Regarding the 200-year 24-hour event is proven to have attenuation for compliance points #1 and #3. However, for the remaining compliance points, a 200-year 24-hour existing conditions model was not available for comparison and therefore is not assumed to be attenuated since it could not be verified either way. To better clarify the information in the Project Description, page 3-58 of the Draft EIR has been revised as follows:

> Peak stormwater flows between the 2-year, 24-hour and the 100-year, 24-hour storm events would be attenuated within the University Creek corridor using overbank flow areas. These areas coincide with proposed culvert crossings of the creek where crossings could detain flows as needed for flood control. ~~Although the 200 year, 24 hour event would not be attenuated,~~ tThese crossings have also been sized to allow this event to be conveyed without overtopping the roadways or flood the adjacent developable areas within the plan area. Portions of the PRSP area that drain to Orchard Creek and the Pleasant Grove Creek North Branch include proposed detention basins that would attenuate flows from the 2-year to the 100-year event.

Regarding relocation of the retention facility, the peak flows within University Creek do not account for any retention or detention supplied by the Nichols Drive Industrial Park facility, therefore, the

impacts of its removal are accounted for. Retention volume for the 100-year 8-day event for the Nichols Drive Industrial Park site would need to be relocated or incorporated into another retention facility at the time of its removal.

13-2 The comment requests clarification regarding the effect of the PRSP development on flow volumes in University Creek and raises issues regarding low flow conditions and increased vegetation. See response to comment 24-3 related to base flows. Preliminary runoff calculations of runoff volumes delivered to University Creek from the PRSP area are shown in Table 4.9-3. As discussed in Mitigation Measure 4.9-1a, final calculations will be included in the final Drainage Report. The comment also suggests that the wording of Mitigation Measure 4.9-4c is confusing; however, the comment is not specific about why the text is confusing. The mitigation measure requires projects creating and/or replacing 1 acre or more of impervious surface to demonstrate hydromodification management of stormwater such that the amount of post-project runoff is kept equal to or below pre-project flow rates for the 2-year, 24-hour storm event. This approach is consistent with Section 4.3 of the West Placer Storm Water Quality Design Manual, which states "The required performance standard for hydromodification control consists of maintaining post-project runoff at or below pre-project flow rates for the 2-year, 24-hour storm event."

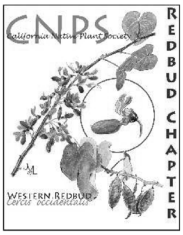
13-3 See response to comment 4-60 regarding the potential inconsistencies on Sunset Boulevard and Campus Park Boulevard at the PRSP/ARSP boundary.

13-4 The comment notes that the PRSP water system proposes 12-inch pipes while pipes coming from the Amoruso Ranch Specific Plan area would be 24-inch pipes. See response to comment 4-79.

13-5 The comment questions whether the PRSP area gets to utilize the expanded capacity of the PGWWTP financed by other projects if development in the area has not yet paid its fair-share contribution. The Draft EIR includes Mitigation Measure 4.15-4a and 4.15-4b, which requires project proponents to fund expansion. As stated in the Draft EIR (page 4.15-51), implementation of Mitigation Measures 4.15-4a and 4.15-4b would require the expansion of treatment capacity at the PGWWTP and expansion of the SPWA Regional Service Area Boundary to accommodate wastewater flows generated by buildout of the SAP area. Expansion of the PGWWTP was identified as part of the Wastewater Master Plan EIR and West Roseville Specific Plan EIR. Project proponents for projects within the net SAP and PRSP areas would be required to pay their fair share of the costs of the PGWWTP expansion, and any applicable costs associated with additional environmental review and mitigation measures, through the payment of sewer connection fees. The capacity expansion would be required prior to construction of development within the net SAP and PRSP areas. If the capacity expansion cannot be completed in time to serve all of buildout within the net SAP and PRSP areas, then development may continue until existing capacity has been exhausted and the remaining development shall be curtailed until sufficient wastewater treatment and discharge capacity becomes available.

13-6 The comment states that Impact 4.15-5 in the Draft EIR is not clear what the impact on other projects relying on Reason Farms (Pleasant Grove Retention Facility) would be from the infrastructure required to mitigate PRSP impacts. The analysis in the Draft EIR included expansion of the Pleasant Grove Retention Facility beyond its approved design capacity in order to accommodate the project's volumetric retention needs. Therefore, the project would not compete for capacity with other projects, which were planned for in the approved design of the facility. Also, see Master Response 6: Drainage and Flooding and response to comment 3-17.

13-7 The comment suggests clarifications to page 3.3-16 of Appendix F of the Draft EIR. The locations of the interties may be located in either the PRSP area or Amoruso Ranch. A pressure regulating/sustaining valve, along with fluoridation, may be required. Intertie design will be reviewed and approved by the City of Roseville and PCWA. As this appendix is a technical document prepared for the project, it represents preliminary designs and plans that may change prior to construction. Revisions to the technical studies are not necessary as part of the Final EIR.



Redbud Chapter – California Native Plant Society

Letter 14

February 22, 2019

Shirlee I. Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite #190
Auburn, CA 95603

Submitted by email to: sherring@placer.ca.gov

Dear Ms. Herrington
The Redbud Chapter of the California Native Plant Society, which serves western Placer and Nevada Counties, appreciates this opportunity to provide comments on the Sunset Area Plan and Placer Ranch Specific Plan Draft Environmental Impact Report (DEIR).

The California Native Plant Society (CNPS) is a non-profit environmental organization founded in 1965 with 10,000 members in 35 Chapters across California. The mission of CNPS is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

Our comments are as follows:

The DEIR identifies dozens of environmental impacts that are both significant and unavoidable, yet does not meet the mandate of CEQA to (a) identify all feasible mitigation measures that would mitigate or lessen significant impacts; (b) evaluate mitigation measures to determine if they are feasible; (c) evaluate mitigation measures to determine if they are enforceable (e.g., is there a regulatory process to ensure compliance, is there funding available; and (d) evaluate whether or not the mitigation measure will mitigate long-term impacts and if all feasible mitigation measures have been identified.

For example, Impact 4.4-2: Loss of special status plants was identified as "significant" noting that "Implementing the project would result direct removal of wetland habitat known to support dwarf downingia, a California species of special concern, and potential habitat for other special status plant species. … This impact would be significant." DEIR, Biological Resources, p.42. The DEIR, "Loss of suitable could result in direct removal of special-status plants if they are present. Future development could also result in indirect impacts on special-status plants if any are present in portions of the net SAP area to be preserved as open space, including impacts caused by pollutants transported by urban runoff and other means, airborne particulates, changes in vegetation as a

14-1

result of changes in land use and management practices, altered hydrology from the construction of adjacent residential development and roadways, intrusion of humans, habitat fragmentation, and the introduction of invasive species or noxious weeds from surrounding development. Indirect effects of habitat modification and fragmentation could degrade habitat quality to a degree that it is no longer suitable for special-status plants to regenerate such that these plant populations eventually die out. Direct and indirect impacts on special-status plant species would be potentially significant." DEIR, Biological Resources, p. 42.

This Impact was included in the list of "Significant and Unavoidable Impacts," DEIR, Other CEQA Mandated Sections, p. 2.

The identified "mitigation measures" fail to meet CEQA requirements, and instead simply reference vague SAP policies: "Implementing the project would result in loss and degradation of known occupied and potential habitats for special-status plant species. Implementation of SAP Policy NR 2-1 [Special-Status Plant Species Protection]" and Program NR-5 would reduce impacts on known and potentially-occurring special-status plant species within the project area and off-site improvement areas within the County's jurisdiction because project proponents would be required to identify and avoid special-status plant populations to the extent feasible, and provide compensation for the unavoidable loss of special-status plants through establishment of new populations, conservation easements, or other appropriate measures." DEIR, Biological Resources, p. 43.

In fact, the full text of SAP NR 2-1 is as follows: The County shall ensure protection of special-status plant species and their habitat including State- and Federally-listed threatened or endangered species." Sunset Area Plan, Section 4. Natural Resources, p. 4-3.

14-1 cont.

" Program NR-5" appears to relate to Air Quality, but since there was no page reference or link, it was not possible to determine what "Program NR-5" provides and requires, or whether it exists.

As a "mitigation measure," SAP NR 2-1 clearly fails to meet at least two of the CEQA requirements that the DEIR:

(c) evaluate mitigation measures to determine if they are enforceable (e.g., is there a regulatory process to ensure compliance, is there funding available);and
(d) evaluate whether or not the mitigation measure will mitigate long-term impacts and if all feasible mitigation measures have been identified.

There does not appear to be any language in the SAP Natural Resources Policies or Programs that warrants a conclusion that SAP NR 2-1 is enforceable or whether it will mitigate long-term impacts. In fact, no source is referenced for the assertion that "project proponent would be required to provide compensation for the unavoidable loss of special status plants through establishment of new populations, conservation easements, or other appropriate measures."

Nor is there any evidence of a regulatory process to determine whether a proponent has identified and avoided special-status plants, whether avoidance is or is not feasible, how compensation is decided, and what measures are "appropriate" as compensation.

There are similar deficiencies in the DEIR's treatment of other "Significant and Unavoidable" Impacts that relate directly to special status plants and their habitats, including Impact 4.4-1: Loss and degradation of state or federally protected waters; Impact 4.4-6: Loss or degradation of riparian habitat; and Impact 4.4-7: Conflict with local policies or ordinances protecting biological resources. 14-1 cont.

Finally, the DEIR's conclusion that Cumulative Impact 4.4-13: Contribution to loss of special-status plants is "less than significant' is clearly deficient. The DEIR spells out the importance of vernal pool habitats to special status plant species as follows:

"As noted under Impacts 4.4-1, 4.4-2, and 4.4-3, vernal pools are one of California's most threatened habitats. Historic losses of vernal pool habitat in combination with projected losses from existing, proposed, planned, and approved projects constitute a cumulatively substantial reduction in vernal pool habitat in the region and the state. Habitat losses of this magnitude have a substantial adverse effect on plant species that rely on this habitat type, including dwarf downingia and legenere. Vernal pools and vernal pool plant species have been threatened by widespread conversion to agricultural uses and urban development. Loss of vernal pool habitat has resulted in substantial declines in vernal pool-dependent special-status plant species statewide and in the region. This represents an existing significant cumulative impact.

"The project area is known to support two vernal pool-dependent special-status plant species, dwarf downingia and legenere, and could support additional vernal dependent special-status plant species. Implementing the SAP would result the conversion of approximately 2,865 acres of vernal pool complex containing an estimated 70 acres of vernal pool type wetlands to developed land uses. Implementing the PRSP would convert an additional 1,865 acres of vernal pool complex containing approximately 46 acres of vernal pool type wetlands to developed land uses. Known occupied habitat in the northern portion of the SAP area is within existing and proposed preserves and therefore would ensure preservation of these species within the project area. Nonetheless, dwarf downingia has been found in a portion of the PRSP that would be developed, and other special-status plants could be present in other areas of the project area that would not be preserved." DEIR, Biological Resources, p. 77. 14-2

Despite the initial observation that there is "an existing significant cumulative impact", the DEIR concludes that the project would not considerably contribute to a significant cumulative impact because of mitigation by the SAP policy and Program discussed above, in virtually identical language. DEIR Biological Resources, p.77.

For the reasons stated above, this analysis of mitigation measures does not meet CEQA requirements. Thank you for your consideration of these comments.

Sincerely,

Jeanne M. Wilson, President
Redbud Chapter – California Native Plant Society
president@redbud-cnps.org 530-570-8009

Letter 14	California Native Plant Society Jeanne M. Wilson, President, Redbud Chapter February 22, 2019

14-1 The comment states that the Draft EIR does not meet CEQA requirements for mitigation measures. See response to comment 54-1, which describes how the Draft EIR complies with CEQA requirements for mitigation measures.

The comment suggests that Program NR-5 relates to air quality. Program NR-5 is a "natural resources" program identified in the SAP on page 9-13. The full text of Program NR-5 is also included in Section 4.4 of the Draft EIR, "Biological Resources," on page 4.4-32. Program NR-5 provides detailed guidelines for protection of special-status plants.

The comment states that there are no sources for the assertion that the project proponent would be required to provide compensation for unavoidable loss of special-status plants through establishment of new populations, conservation easements, or other appropriate measures. The comment also suggests there is no evidence of a regulatory process to determine whether avoidance has occurred and to guide compensation. Program NR-5, which the commenter was not able to locate (although, as mentioned above, is included in the section), includes all of these details. Regarding the requirement to provide compensation, Program NR-5 specifically requires, in the case adverse effects to special-status plants cannot be avoided, and after notification of California Department of Fish and Wildlife (CDFW), a mitigation and monitoring plan to compensate for the loss of special-status plant species found during preconstruction surveys, if any. The mitigation and monitoring plan shall be submitted to CDFW or USFWS, as appropriate depending on species status, for review and comment. The County shall consult with these entities, as appropriate depending on species status, before approval of the plan to determine the appropriate mitigation measures for impacts on any special-status plant population. Mitigation measures may include preserving and enhancing existing on-site populations, or creation of off-site populations on project mitigation sites.

The comment suggests that there is no language provided regarding the enforceability of the policies and programs. The SAP describes the mechanics of the implementation programs on page 9-1:

> The implementation programs described in this section relate to the goals and policies of the Plan. Each of these implementation programs describe the intent of the program, who is responsible for implementing the program, when it is to be implemented, and how it is to be funded. The majority of the Plan's policies are to be implemented through the ongoing project approval process, including the review of subdivisions, conditional use permits, minor use permits, design/site review, improvement plan review, and grading permits by the County's decision-making authorities (e.g., Development Review Committee, Zoning Administrator, Planning Commission, Board of Supervisors). Projects are to be reviewed for consistency with the goals, policies, and standards of the Sunset Area Plan as well as the Placer County General Plan. A finding of consistency with these plans must be made for a project to proceed to an approval.

As described above, the implementation programs have enforcement mechanisms almost identical to mitigation measures, including identification of the responsible implementing party, timing, and funding. These programs also require consistency findings with the SAP goals, policies, and standards, prior to approval of individual projects.

It is also important to note that, although the impact conclusion is significant and unavoidable for the Pleasant Grove Retention Facility and off-site transportation and utility improvements (because Placer County does not have jurisdiction to enforce the identified mitigation measures for these project components), impacts on special-status plants within the SAP area would be reduced to a less-than-significant level with implementation of Policy NR-2.1 and Program NR-5.

14-2 The comment expresses disagreement with the Draft EIR conclusion that the contribution to loss of special-status plants is less than significant.

See response to comment 14-1. Because Policy NR-2.1 and Program NR-5 require that special-status plants be identified and either avoided or compensated for, the contributions of the SAP/PRSP to the significant cumulative impact on special-status plants would not be cumulatively considerable.

The special-status plant species that have been found in the SAP area are primarily in areas that are already preserved so these species would persist in the project area.

CSU The California State University
OFFICE OF THE CHANCELLOR
Capital Planning, Design and Construction
401 Golden Shore, 2nd Floor
Long Beach, CA 90802-4210
www.calstate.edu

Elvyra F. San Juan
Assistant Vice Chancellor
(562) 951-4090
esanjuan@calstate.edu

Letter 15

Transmitted via e-mail to:cdraecs@placer.ca.gov

February 21, 2019

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Subject: Sunset Area Plan/Placer Ranch Specific Plan
Draft Environmental Impact Report
State Clearinghouse No. 2016112012

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Sunset Area Plan/Placer Ranch Specific Plan.

The California State University (CSU) extends knowledge and learning throughout California and in local communities, which allows educated individuals to contribute to California's schools, economy, culture and future.

To help fulfill this mission, the CSU has an interest in a potential California State University, Sacramento - Placer Center (Center) within the Placer Ranch area and may possibly be the recipient of a gift of approximately 300 acres within the Placer Ranch Specific Plan (PRSP) for this Center. At present, the site is owned by Placer Ranch, Inc.

As indicated in the report "Potential Economic Benefits of a CSU Campus in Placer County" by Sacramento Regional Research Institute," the establishment of the campus would provide a key role in meeting the needs of local businesses by educating the area's workforce, would bring cultural opportunities, and add value to the local economy through the addition of jobs and expenditures associated with employee compensation, campus operations and project construction. The positive economic impact was recognized in a September 2016 report to the County of Placer Board of Supervisors which indicated that the Sacramento State-Placer Center has the potential to act as a catalyst for investment and development in the Sunset area.

CSU Campuses
Bakersfield
Channel Islands
Chico
Dominguez Hills
East Bay
Fresno
Fullerton
Humboldt
Long Beach
Los Angeles
Maritime Academy
Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego
San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

The Sunset Area Plan/Placer Ranch Draft Environmental Impact Report (DEIR) evaluates the Sac State-Placer Center at a programmatic level of detail for educational use. Although no formal timeline has been established for a possible educational center, there is a potential that a CSU and/or California Community College could tier from this DEIR in order to support any subsequent project-specific California Environmental Quality Act (CEQA) analysis that may be required in the future.

In the event the Board of Trustees of the CSU accepts the property on behalf of the State of California, the site will be under the land use and permitting jurisdiction of the CSU. This transition will permanently relieve Placer County of jurisdictional authority over the site. Specifically, when the transfer is complete, the governing policies of the Placer County General Plan and the PRSP as adopted, as well as the mitigation measures or assessments identified in the DEIR will no longer be applicable to the site. The same limitations will apply with respect to the regulatory jurisdiction of other local and regional agencies or districts. 15-1

Prior to action on a master plan or specific campus development project for the Center, the CSU will conduct its own project-specific environmental review. Since a master plan or specific campus development project is not currently under consideration by the CSU at this time, it would be inappropriate to prejudge the next stage of environmental review, in terms of either impacts or how the university might elect to approach mitigation and the selection of project alternatives to the extent required by law. However, the university is acutely focused on ensuring compliance with the procedural and substantive requirements of the CEQA and to fully addressing potential environmental impacts to the extent feasible and required by law.

The CSU looks forward to working with the County of Placer, the local community, and Placer Ranch.

Should you have questions, please do not hesitate to contact Steven Lohr, Chief of Land Use Planning and Environmental Review, at (562) 951-4120, slohr@calstate.edu.

Sincerely,

Elvyra F. San Juan
Assistant Vice Chancellor

ESJ:SCL:kk

Distribution:
Todd Leopold, County Executive Officer, County of Placer
Dave Defanti, Deputy County Executive Officer, County of Placer
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Michele Kingsbury, Principal Management Analyst, County of Placer
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Justin Reginato, Associate Vice President, Facilities Management, Sacramento State
Steven Relyea, Executive Vice Chancellor and Chief Financial Officer, CSU Office of the Chancellor
Dawn Theodora, Assistant Vice Chancellor and Chief Counsel, Business and Finance, CSU Office of the Chancellor
Chris Fowler, University Counsel, CSU Office of the Chancellor
Paul Gannoe, Chief, Facilities Planning, CSU Office of the Chancellor
Steven Lohr, Chief of Land Use Planning and Environmental Review, CSU Office of the Chancellor

Letter 15	The California State University, Office of the Chancellor Elvyra F. San Juan, Assistant Vice Chancellor February 21, 2019

15-1 The comment notes that a CSU and/or California Community College could tier from the Draft EIR in the future. The comment also notes that in the event the CSU campus site is donated and CSU accepts the property on behalf of the State of California, the campus site would be under the land use and permitting jurisdiction of the state and that this transition would relieve the County of jurisdictional authority over the site. The comment goes on to note that following that transition, all County governing documents, policies and provisions would not apply to the CSU campus site, and that the CSU would be responsible for ensuring CEQA compliance to fully address any potential environmental impacts associated with any future planning for the CSU campus site.

Chapter 1, "Introduction," of the Draft EIR notes that the CSU campus site has been analyzed at a programmatic level. However, revisions have been made to clarify that once the CSU campus site has been accepted by the State of California, the governing policies of the Placer County General Plan and PRSP would no longer be applicable to the site. This section also states that the CSU would conduct its own project-specific environmental review to ensure CEQA compliance for any future planning of the CSU campus site. Specifically, the second paragraph on page 1-2 of the Draft EIR is revised as follows:

> This EIR evaluates the potential environmental impacts associated with implementing the SAP and PRSP. The SAP is a policy document intended to guide growth in the SAP area over a 20-year planning horizon; buildout of the SAP area is expected to occur over 80 years or more. In accordance with Section 15168 of the State CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project and, among other things, are related geographically or in connection with issuance of rules, regulations, or plans to govern the conduct of a continuing program. In accordance with Section 15161 of

the State CEQA Guidelines, a project EIR focuses on the changes in the environment that would result from a development project. Because of the broad geography, long timeframe anticipated for buildout, and policy-oriented nature of the SAP, the impact analysis of the SAP is prepared at a programmatic level—that is, a more general analysis with a level of detail and degree of specificity commensurate with that of the plan itself, focusing on the effects that can be expected to follow from adoption of the plan. The PRSP, however, is assessed at a project level in this EIR, because project details are developed to a sufficient degree that environmental effects that would result from development of the PRSP can be identified and assessed with greater certainty, and specific mitigation measures developed to address potentially significant impacts. The Sac State–Placer Center portion of the PRSP, however, remains conceptual; the university has yet to develop project-specific detail in the form of a master plan for the campus. ~~This EIR provides substantial analysis of the university campus based on the information available and will provide valuable streamlining for future decisions by the California State University (CSU), but additional environmental review may be required by the CSU, which would serve as lead agency for the subsequent project.~~ Therefore, this EIR evaluates the Sac State–Placer Center at a programmatic level of detail for educational use. In the event the Board of Trustees of the CSU accepts the property on behalf of the State of California, the site would be under the land use and permitting jurisdiction of the CSU, which would relieve Placer County of jurisdictional authority over the site. Specifically, when the transfer is complete, the governing policies of the Placer County General Plan and the PRSP as then adopted would no longer be applicable to the site. Prior to a discretionary action by the CSU requiring consideration under CEQA, the CSU would conduct its own project-specific environmental review. At that time, the university would ensure compliance with the procedural and substantive requirements of CEQA and in fully addressing potential environmental impacts as required by law. Additional discussion regarding the level of detail of the analysis is provided under the heading “Approach to the Environmental Analysis” in Chapter 4.0, “Affected Environment, Environmental Consequences, and Mitigation Measures.”



CENTER for BIOLOGICAL DIVERSITY Because life

Letter 16

2/22/2019

Sent via email and FedEx (w/ references)

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012)

Dear Ms. Jacobsen,

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Sunset Area Plan and Placer Ranch Specific Plan (the "Project"). The Center has reviewed the Draft Environmental Impact Report ("DEIR") closely and is concerned by the numerous significant impacts the Project would have on sensitive wildlife and ecosystems in and around the Project area. The Project would destroy thousands of acres of vernal pools, directly harming numerous special-status species on what is one of the last intact areas of habitat in western Placer County. The California Environmental Quality Act ("CEQA") mandated environmental review is inadequate and fails to comply with the statute. The Center urges approval of the Project be denied, or at the very least substantial revisions to the DEIR to better analyze, mitigate or avoid the Project's significant environmental impacts.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.4 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Northern California.

I. The DEIR's Alternatives Analysis Is Inadequate

The DEIR's analysis of Project alternatives is flawed and does not comply with the requirements of CEQA. First, the alternatives analysis uses an improper No-Project Alternative, which serves to understate the impacts of the proposed Project and fails to adequately inform decisionmakers and the public about the consequences of not approving the Project. Second, the alternatives analysis fails to include a reasonable range of alternatives and instead provides a

16-1

narrow range of alternatives that vary little from the proposed Project. Third, the DEIR fails to assess feasible alternatives that would significantly reduce the impacts of the Project without substantial evidence to justify its reasoning.

A. Assuming Buildout of the Sunset Industrial Area Plan as the No-Project Alternative is Improper

The DEIR confines and obscures its alternatives analysis by using a no project alternative that is only slightly less impactful than the other proposed alternatives. The DEIR's alternatives analysis assumes that if the proposed Project is not built, the area will be developed according to the 1997 Sunset Industrial Area Plan ("SIAP"). (DEIR at 6-9.) The CEQA Guidelines ("Guidelines") require analysis of a no project alternative to assess the existing site conditions as well as "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." (Guidelines § 15126.6(e)(2).) While the SIAP was indeed approved, the site remains 90% undeveloped 20 years after approval and the DEIR provides no evidence that the SIAP proposal has taken any further steps toward implementation. (DEIR at 3-5.) It is not reasonable to therefore to assume buildout of the SIAP is as "expected to occur in the foreseeable future" should the proposed Project not be approved. Any attempt to implement SIAP would require, at the very least, a subsequent environmental review, since the environmental conditions of the site, region and state have dramatically changed since the 1997 approval. (See Guidelines § 15162(a) [requiring subsequent review if the lead agency determines new information becomes available, or project impacts would occur that were not assessed during the initial review].) Indeed it appears more likely that should the Project not go forward, the area would remain in its largely undeveloped state unless another proposal and environmental review process is completed. 16-1 cont.

The DEIR also asserts that the no project alternative would be the environmentally superior alternative, despite producing greater impacts to biological resources as compared to the proposed Project. (DEIR at 6-28.) The DEIR then attempts to cast the proposed Project in an artificially positive light regarding its potential impacts so that the Project now appears to be only minimally more environmentally damaging. This approach is misleading to decision-makers and the public. Instead, the DEIR should be revised to present a no project alternative that more accurately depicts the existing undeveloped conditions of the SAP site, so that the impacts of the alternatives can be fully and adequately analyzed...

B. The DEIR Fails to Assess a Reasonable Range of Alternatives

The Project as proposed would result in numerous significant and unavoidable impacts, meaning a thorough alternatives analysis is absolutely necessary in fulfilling the DEIR's role of informing the public and decision-makers. Courts have consistently held that "[o]ne of [] an EIR's major functions … is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 400.) CEQA prohibits an agency from approving projects as proposed "if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." (Pub. Res. Code § 21002.) While the DEIR does not need to address "every conceivable 16-2

alternative," it should provide a reasonable range that allows the reader to understand the proposed Project's impacts and a range of feasible alternatives that might avoid project impacts. (Guidelines § 15126.6(a).) Under CEQA, "the public agency bears the burden of affirmatively demonstrating that, notwithstanding a project's impact on the environment, the agency's approval of the proposed project followed meaningful consideration of alternatives and mitigation measures." (*Mountain Lion Foundation v. Fish & Game Com*. (1997) 16 Cal.4th 105, 134.) The DEIR analyzes a narrow range of alternatives that do little to avoid Project impacts, falling short of a meaningful analysis. (DEIR at 6-8, 9, 28, see Table 6-7.) Despite the Project's significant impacts, the DEIR concedes that "none of the other alternatives [excluding the no project alternative] avoid or substantially reduce a significant impact of the Project." (DEIR at 6-28.) The DEIR also fails to provide substantial evidence to explain its rejection of the analyzed alternatives, nor is there a discussion of how the Project objectives would be met by each alternative. CEQA requires a more thorough and complete alternatives analysis. 16-2 cont.

C. The DEIR Failed to Analyze a Feasible Alternative that Would Significantly Lessen Project Impacts

The DEIR also fails to meet its CEQA alternative analysis mandate because it omitted consideration of a feasible alternative that would reduce and avoid significant Project impacts while meeting most of the objectives. The Citizen-Initiated Smart Growth Plan ("CISGP"), presented to the County by the Alliance for Environmental Leadership ("AEL"), is an example of the sort of alternative the CEQA process strives to illuminate. (Marsh, 2019). The DEIR should be revised to expand the scope of the alternatives analysis so that feasible alternatives, such as the CISGP, are made available so that the public and decision-makers are adequately informed, as directed by CEQA.

II. The DEIR Improperly Relies on Uncertain And Infeasible Mitigation Measures

The Project will have significant and unavoidable impacts to nearly every resource category that falls under the purview of CEQA. The Project's impacts are particularly large in number and magnitude when considering the biological resources present on the Project site. While the DEIR identifies significant impacts, it falls short when attempting to provide adequate mitigation. The rampant uncertainty and speculation of the DEIR's mitigation program gives the public and decision-makers no concrete understanding of how the immense impacts of the Project will be addressed. The inability of the DEIR to provide feasible mitigation demonstrates that the Project should not and cannot advance in its current form because the Project site is grossly inappropriate for a development of this type and scale. 16-3

A. The DEIR's Reliance on the Placer County Conservation Plan does not Constitute Feasible Mitigation

The mitigation of significant environmental impacts must be presented in a way that offers the public and decision-makers a sense of confidence that should the Project be approved, impacts will actually be mitigated to the maximum extent feasible. The DEIR fails to do this, as

its mitigation for biological resources relies on the draft Placer County Conservation Plan ("PCCP") to meet its permitting requirements under multiple federal and state laws. However, at the time of the DEIR's release, the PCCP is nothing more than a proposal. (DEIR at 4.4-28.) CEQA requires that mitigation measures that reduce or avoid Project impacts must be concrete ad not speculative. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.4th 260, 281 [mitigation measures that are so undefined that their effectiveness is impossible to determine are legally inadequate].) The DEIR approach to base its mitigation on a draft plan, for which there is no guarantee, let alone indication, of approval, does not provide the certainty required under the Guidelines. (Guidelines § 15126.4.) The DEIR provides no assurances or substantial evidence that the PCCP will be approved. Instead the PCCP is discussed throughout the document in speculative terms such as "if the PCCP is approved by the state and federal agencies and is adopted and implemented in time to support development under the PRSP and Net SAP." (DEIR at 4.4-41.) Because the DEIR offers no support for the likely approval of the PCCP, it cannot rely on the plan to mitigate the Project's many significant impacts.

16-3 cont.

B. The Project Fails to Adequately Mitigate Significant Impacts to Special-Status Species and Protected Habitats

The DEIR fails to provide the level of mitigation that will be required for the issuance of permits that will be necessary for the Project to ultimately be approved. The Project site is home to endangered and special-status plants and wildlife, as well as multiple forms of high value habitat types. (DEIR at 4.4-11, 12.) The Project would require permits under many different statutes from multiple of state and federal agencies. (DEIR at 4.4-22-24.) Even if the Project could rely on the PCCP to meet its mitigation requirements there remain serious issues with the feasibility and capacity of the PCCP to fully mitigate the Project significant environmental impact.

For example, one of the permitting requirements the Project, via the PCCP or otherwise, will need to satisfy is the "no net loss of wetland habitat," as required by the United States Army Core of Engineers ("USACE"). (DEIR at 4.4-41.) However, the DEIR states that "existing credits may not be enough to fully cover the loss of wetland functions resulting from project implementation, and it is unknown if sufficient land would be available from willing sellers to fully mitigate the loss," which demonstrates the infeasibility of the proposed mitigation measures. (DEIR at 4.4-41.) The limitation of available land and credits would also apply in the event the PCCP is granted approval. Therefore, the DEIR appears to be admitting that there simply isn't enough land or mitigation credit available in the region to meet USACE standards of no net loss of wetland functions.

16-4

The DEIR's mitigation for impacts to federally listed vernal pool invertebrates is also insufficient to meet permitting standards. A large portion of the Project site falls within the Western Placer County core area as identified in the in the United States Fish and Wildlife Service ("USFWS") vernal pool recovery plan. (DEIR at 4.4-44.) The USFWS targets preservation of 85% within core recovery areas, yet the Project would achieve only 40%. (DEIR at 4.4-44.) The Project would remove over 5,000 acres of low density vernal pool complexes from the Project site. (DEIR at 4.4-48.) The DEIR, similarly to the uncertain language referenced above, cannot determine whether PCCP mitigation would reduce the significance of the vernal

pool removal, as the PCCP has not yet been approved. (DEIR at 4.4-48.) Should the PCCP be adopted and implemented in time to serve the Project, the mitigation would "not necessarily occur within the western Placer County core area because there is a limited amount of habitat present within the core area and a large proportion of it has already been developed or is planned for development." (DEIR at 4.4-48.) The DEIR acknowledges that mitigation in the absence of the PCCP would result in a lesser reduction in impacts than under the PCCP. (DEIR at 4.4-48.) This shows that even if the PCCP is adopted, it will do very little toward achieving the goals of the vernal pool recovery plan, and therefore it is difficult to see how USFWS would issue Endangered Species Act ("ESA") take permits under the PCCP for the Project's widespread destruction of vernal pool species such as the vernal pool fairy shrimp, and vernal pool tadpole shrimp.

16-4 cont.

C. The DEIR's Analysis of the Placer Ranch Specific Plan's Impacts and Mitigation is Insufficient

The analysis and mitigation of the PRSP's biological resources impacts does not meet the level of specificity required for a project-level assessment. The DEIR contains two levels of analysis, a programmatic level for the SAP, and a project level for the PRSP. (DEIR at 1-2.) While a programmatic EIR can provide more general assessments in its first tier of analysis, a project-level analysis must provide more detail regarding project impacts and proposed mitigation measures. (Guidelines § 15152.) The specificity of an EIR is determined by the nature of the project and the 'rule of reason.' (*Citizens for Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1048.) The PRSP is a planned community, with specific land uses and the intensity thereof already established, therefore, it is reasonable that the DEIR assess the impacts and propose mitigation for those specific uses.

16-5

The DEIR provides separate impact assessments for the SAP and PRSP areas but applies the same general and deferred mitigation to each planning area. For example, Mitigation Measure 4.4-5a provides inadequately brief mitigation instructions for future development to avoid impacts to western pond turtles should the PCCP not be adopted. (DEIR at 4.4-59.) The mitigation requires surveys before earthmoving, and subsequent relocation if individual turtles are observed. (DEIR at 4.4-59.) There is no discussion of where the turtles will be relocated, nor are there performance standards that dictate the quality of relocation habitat or the turtle's survival post-relocation. Additionally, the measure only applies to construction activities within 200 feet of suitable aquatic habitat. (DEIR at 4.4-59.) Western pond turtles are known to utilize upland habitats up to 1,300 feet away from aquatic habitat. (Semlitsch and Bodie, 2003). The DEIR should be revised to include adequately detailed analysis of the impacts and mitigation measures for the PRSP, as well as providing accurate species-specific mitigation.

Given the vulnerability of the site's ecological resources and the DEIR's acknowledgment of regional development pressures, the scope and design of the Project should be seriously reconsidered.

III. The DEIR Fails to Adequately Analyze and Mitigate the Impacts of the Project on Biological Resources.

16-6

The Project site, in its currently undeveloped state, is home to numerous plant and animal species that rely on the area's unique ecological communities. The DEIR identifies 42 special-status fish and wildlife species that could occur on the site (DEIR at 4.4-15), and 10 special-status plant species that could occur on or near the Project site (DEIR at 4.4-12). Despite these findings, the DEIR fails to identify and assess the impacts to some of these species, while completely omitting discussion of other impacts. This inadequate and incomplete analysis violates CEQA's requirements that all environmental impacts from a project are fully disclosed and analyzed.

A. The DEIR's Analysis of Impacts to Western Spadefoot Toad is Insufficient.

The DEIR does not contain sufficient information to allow proper assessment of the Project's impacts to western spadefoot, which also undermines the efficacy of proposed mitigation. The DEIR acknowledges the impacts on western spadefoot in its discussion of vernal pool removal, as well briefly listing other potential indirect impacts due to Project development. (DEIR at 4.4-44, 45.) However, the discussion is superficial, and provides little detail about actual impacts because the location and population of western spadefoot in and around the Project site is unknown due to a lack of accurate surveying. Surveys for western spadefoot have not been conducted on the Project site since 2005. (DEIR at 4.4-45.) The DEIR defers surveys to future project proponents, when a qualified biologist must determine whether western spadefoot is present and take subsequent mitigation steps thereafter. (DEIR at 4.4-46.) Since western spadefoot is not covered under the PCCP, the DEIR should identify areas where western spadefoot is present, so that the scale of potential impacts and feasibility of mitigation, such as relocation, can be appropriately assessed by public and decisionmakers. Given the increasing development pressure on the area and the lack of suitable land for vernal pool restoration, a thorough analysis of potential impacts and suitable replacement habitat should be identified now, not at some later date. 16-6 cont.

In particular, surveys for western spadefoot should be conducted before the Project is considered for approval so that the extent of impacts can be accurately calculated before damaging land uses are locked in at the programmatic level. The DEIR runs through a list of potential indirect impacts to western spadefoot as a result of Project development, such as take related to traffic, landscaping and pesticide exposure. If left to a future project proponent, surveys and subsequent mitigation will be ineffective if habitat is on or near an area approved for residential or industrial uses that lead to take of western spadefoot.

Additionally, the DEIR fails to consider the impacts the night lighting on western spadefoot. Studies have shown that amphibians and reptiles can experience disrupted physiology, behavior and ecology when exposed to artificial light that interferes with natural lighting cycles. (Perry, 2008). As the Project proposes to urbanize the area, it will introduce numerous sources of artificial light. The DEIR must include updated survey information so that proper mitigation and planning can take place to minimize harm to western spadefoot.

B. The DEIR Fails to Identify and Assess Impacts to Vernal Pool Plant Species and Dependent Insect Species. 16-7

The specialized nature of vernal pool plant species require a specific range of habitat and resource conditions. The presence of a healthy population of pollinator insects is key to the survival of vernal pool plants; the loss of pollinators due to habitat fragmentation and upland habitat loss threatens the long-term viability of specialized vernal pool plant species. (USFWS, 2005). The DEIR identifies significant and unavoidable impacts to vernal pool plant species due to loss of vernal pool habitat but is silent on the impact the Project will have on the availability of pollinators in the area. Many pollinator species, such as solitary bees, specialize on flowering vernal pool taxa, such as *Downingia,* and do not disperse far from their food source. (Thorp, 1998). Since dwarf downingia is known to occur on the Project site, and is protected under CEQA (DEIR at 4.4-14), the DEIR must assess the impacts of the Project on the pollinator species upon which the plant depends.

The DEIR must also consider pollinator species in its mitigation measures intended to address the significant impacts to vernal pool plant species. As many vernal pool plant species rely on a narrow range of pollinator species, it is critical that a consideration of mitigation and/or restoration land include an assessment of habitat for pollinators. Additionally, mitigation for vernal pool and adjacent upland habitat destruction should include the removal and transport of resident pollinator species to the designated restoration site. (Thorp, 1998). It is critical that pollinator surveys be conducted for impacted vernal pool complex habitat, so that suitable off-site restoration areas can be identified. The suitability of such sites must consider available upland habitat for currently present pollinators, of the reestablishment of translocated pollinator species if no pollinators are present. The DEIR should be revised to include such analyses; any delay in these studies could result in mitigation opportunities becoming unavailable.

16-7 cont.

IV. Conclusion

Given the possibility that the Center will be required to pursue appropriate legal remedies in order to ensure enforcement of CEQA, we would like to remind the County of its duty to maintain and preserve all documents and communications that may constitute part of the "administrative record." As you may know, the administrative record encompasses any and all documents and communications which relate to any and all actions taken by the County with respect to the Project, and includes "pretty much everything that ever came near a proposed [project] or [] the agency's compliance with CEQA . . . ." (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further contains all correspondence, emails, and text messages sent to or received by the County's representatives or employees, which relate to the Project, including any correspondence, emails, and text messages sent between the County's representatives or employees and the project proponent's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

16-8

Thank you for the opportunity to submit comments on the DEIR for the Sunset Area Plan/Placer Ranch Specific Plan. The DEIR highlights numerous significant and unavoidable environmental impacts, for which it fails to propose feasible mitigation. The Center strongly urges the County to reconsider such sweeping, intensive development on the Project site. Placer County should be protecting its rare and vulnerable ecological resources, instead of reviving a

decades-old development plan that would destroy countless acres of vernal pool, grassland and riparian habitat. In light of the foregoing analysis highlighting the DEIR's deficiencies and the unavoidable environmental impacts, the Project should not be approved in its current form. 16-8 cont.

Please add the Center to your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the number or email listed below.

Sincerely,



Ross Middlemiss
Legal Fellow
Center for Biological Diversity
1212 Broadway, Suite #800
Oakland, CA 94612
Tel: (510) 844-7100
rmiddlemiss@biologicaldiversity.org

References
(Attached on CD)

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Letter 16	Center for Biological Diversity Ross Middlemiss, Legal Fellow February 22, 2019

16-1 The comment states that the Draft EIR's alternatives analysis is inadequate because it uses an improper No-Project Alternative, does not include a reasonable range of alternatives, and does not evaluate a feasible alternative that would significantly reduce the project's impacts. The following response addresses the first topic (No-Project Alternative), whereas response to comment 16-2, below, addresses the latter two topics of this comment regarding the alternatives analysis.

Regarding the No-Project Alternative, the comment suggests that, due to the slow pace of development in the current SIA, the Draft EIR should have included a No-Project Alternative that assumes no development would occur. First, although development within the existing SIA has not been rapid, development has occurred over the past 20 years, and additional development would be expected over the next 80+ years (the length of time expected for full buildout of the SAP). Therefore, an alternative that assumes no development would occur would not be realistic.

The State CEQA Guidelines (See Section 15126.6[e]) provides guidance regarding the No-Project Alternative. (e) "No project" alternative. Section 15126.6(e)(1) states that the no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline. Further 15126.6(e)(2) indicates that the No-Project Alternative analysis should discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. Section 15126.6(e)(3) provides specific guidance regarding large policy-oriented plans, such as the project: A discussion of the "no project" alternative will usually proceed along one of two lines: (A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically, this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan. (CCR Title 14, Section 15126.6[e][3]) Because the project is a large, policy-oriented plan, the project's No Project Alternative, which assumes continued implementation of the existing 1997 SIA Plan, is clearly appropriate pursuant to CEQA.

Because a "no development" alternative would be unrealistic and because the Draft EIR includes the appropriate No Project Alternative, no additional alternatives are required and no revisions to the Draft EIR are necessary. Also see Master Response 1: Alternatives Analysis for a detailed discussion of the adequacy of the Draft EIR's alternatives analysis.

16-2 The comment states that the Draft EIR does not include a reasonable range of alternatives and does not evaluate a feasible alternative that would significantly reduce the project's impacts. See Master Response 1: Alternatives Analysis, which explains CEQA guidance for what constitutes a reasonable range of alternatives. As described therein, the four alternatives (not including the No-Project Alternative) studied in detail in the Draft EIR constitute a reasonable range of potentially feasible alternatives as required by CEQA. The master response also explains that an EIR is not required to consider alternatives that eliminate or reduce *all* of a project's significant adverse environmental impacts (State CEQA Guidelines Section 15126.6[a], [f]). Also, as explained in the master response, Chapter 6 of the Draft EIR has been clarified to reflect the conclusions about each alternative substantially reducing a significant impact of the proposed project. These changes are identified in Chapter 2, "Revisions to the Draft EIR." For these reasons, the Draft EIR's alternatives analysis is adequate. Regarding the suggestion that the County evaluate the CISGP as an alternative, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary

project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

16-3 The comment states that the Draft EIR relies on uncertain and infeasible mitigation measures. See response to comment 54-1, which describes CEQA requirements for mitigation measures and how the Draft EIR complies with these requirements. See Master Response 3: Placer County Conservation Plan and Mitigation.

Specifically, the comment states that the Draft EIR's reliance on the PCCP does not constitute feasible mitigation. See Master Response 3: Placer County Conservation Program and Mitigation. The Draft EIR does not rely solely on the PCCP for impact mitigation; there are optional mitigation measures and front-loaded policies and programs, presented under the heading "Proposed Sunset Area Plan Goals and Policies" beginning on page 4.4-31 of the Draft EIR, that mitigate the project's potential impacts on biological resources in the event the PCCP, including the Western Placer CARP and associated USACE programmatic permits, are not adopted or are not available as a permitting and mitigation strategy for future projects.

16-4 The comment states that mitigation is inadequate for special-status species and habitat and to support permit issuance from multiple state and federal agencies.

Mitigation Measure 4.4-1a (page 4.4-40 of the Draft EIR) requires compensatory mitigation meeting the USACE's no-net-loss standard. If the PCCP, including the Western Placer CARP, are adopted and USACE issues programmatic permits under the plans, then participation in the plan would be consistent with USACE permit requirements by definition. The comment is correct that existing credits or sufficient lands may not be available to fully mitigate project impacts on federally protected wetlands. As the comment indicates, this is disclosed on page 4.4-41 of the Draft EIR, and it is the primary reason the impact conclusion is significant and unavoidable. But this would only be the case under the scenario that the PCCP cannot be used for mitigation. The comment, therefore, is not correct to suggest that these limitations in credits or available land would also be true under the PCCP because issuance of the programmatic permit would mean USACE has made the determination that impacts covered under the PCCP can be offset in a manner that complies with their no-net-loss standard.

Adoption of the PCCP and issuance of take authorization under the PCCP would mean USFWS has determined that impacts on federally listed species can be offset through participation in the PCCP and that the species may be recovered through the PCCP conservation strategy, which would serve as an alternative recovery plan for the covered species (e.g., vernal pool branchiopods).

16-5 The comment states that the Draft EIR's analysis of and mitigation for the PRSP's biological resources impacts does not meet the level of specificity required for a project-level analysis. See Master Response 7: Program- vs. Project-Level Analysis. It cannot be assumed that because a mitigation measure for the program-level portion of the analysis is similar to the mitigation measure for the project-level portion of the analysis that the project-level mitigation measure provides an insufficient level of detail. This is especially true for the topic of biological resources where "suitable habitat" exists within the project site that could be used by a special-status species (whether or not individuals have been identified within that habitat during site surveys). For many types of species, whether the habitat occurs within a 5-acre project site or a 5,000-acre plan area, the necessary measures will be nearly identical for protecting the individuals that could occur within the general habitat type.

Both the project-level and program-level analyses provided in Section 4.4, "Biological Resources," assesses the impacts of proposed land uses and provides mitigation to reduce those impacts. The difference is that the project-level analysis for the PRSP provides specific quantification of common and sensitive habitat losses, based on site-specific surveys, and evaluates potential effects to

common and special-status species that could result from loss of these habitats and other potential direct and indirect effects. For the SAP area, impact determinations are based on loss of common and sensitive habitats as derived from the best available sources rather than site-specific surveys. The program-level analysis is therefore more generalized and may overestimate actual impacts but does not ignore or underestimate any resources that may be affected by development of the SAP area. Because both portions of the project site support the same types of habitats, the biological resources that may be affected by the project are the same and the impact mechanisms are the same, therefore, the same mitigation measures are appropriate for impacts to biological resources at the project and program level. The analysis approach for both the SAP area and the PRSP area is described under the heading "Methods and Approach" on pages 4.4-30 and 4.4-31 of the Draft EIR.

Mitigation Measure 4.4-5a specifically requires that any pond turtles found be relocated to suitable aquatic habitat as determined by a qualified biologist. Therefore, a qualified biologist would assess the quality of relocation habitat before relocating pond turtles to ensure it is suitable for pond turtles. While pond turtles may be found greater than 200 feet from aquatic habitat, they are generally found within this closer distance unless forced to move farther away. The mitigation measure is revised below to extend the survey distance to 300 feet per standard measures used by CDFW. Because all of the suitable upland habitat within 300 feet of suitable aquatic habitat is currently undeveloped and subject to little to no human disturbance, there is no reason for turtles to travel farther from aquatic habitat in search of suitable nesting habitat. Therefore, turtles are unlikely to nest farther than 300 feet from suitable aquatic habitat. Monitoring pond turtles after they're relocated to suitable habitat is not necessary to reduce the impact to a less-than-significant level because the probability of their survival would not be reduced by relocating them to equally suitable habitat away from development. Therefore, the project would not substantially affect the distribution, breeding productivity, viability, or the regional population of western pond turtles.

To clarify that the mitigation measure is intended to relocate turtles to equal- or better-quality habitat than the affected habitat, and to protect eggs and hatchlings as well as adult turtles, Mitigation Measure 4.4-5a on page 4.4-59 of the Draft EIR is revised as follows:

> **Western Pond Turtle**
> Before ground disturbing activities, project proponents shall retain a qualified biologist to determine whether the potential project site contains suitable habitat for western pond turtle. For projects or ground-disturbing activities (including any required off-site improvements) with potential to disturb suitable aquatic or adjacent upland habitat for western pond turtle, the following measures shall be implemented.
>
> - Within 24 hours before beginning construction activities within ~~200~~ 300 feet of suitable aquatic habitat for western pond turtle, a qualified biologist shall survey areas of anticipated disturbance for the presence of western pond turtle, including eggs and hatchlings. The construction area shall be re-inspected whenever a lapse in construction activity of two weeks or more has occurred. If pond turtles or their eggs are found during the survey or observed within the construction area at any other time, they shall be relocated by a qualified biologist, outside of the area of disturbance, to the nearest area ~~with~~ of suitable aquatic habitat of equal or better quality as the affected habitat. ~~and~~ CDFW will be notified of the discovery and relocation of any western pond turtles.
>
> - If western pond turtle nests are found in the disturbance area during preconstruction surveys, a 300-foot no disturbance buffer shall be established between the nest and any areas of potential disturbance. Buffers shall be clearly marked with temporary fencing. Construction will not be allowed to commence in the exclusion area until hatchlings have emerged from the nest, or the nest is deemed inactive by a qualified biologist. When hatchlings emerge from the nest, they shall be relocated by a qualified biologist to suitable aquatic habitat outside of the area of disturbance.

16-6 The comment states that Draft EIR does not analyze potential impacts to all 10 plant species and 42 animal species identified in the biological resources setting section as known or having potential to occur in the region. Some of these species were ruled out from potentially occurring in the project area because it lacks suitable habitat for these species, because the project area is outside of the species' limited range, or other reasons as specified in Tables 4.4-2 and 4.4-3.

The comment further states that Draft EIR's analysis of impacts to western spadefoot is insufficient. A full analysis of potential impacts to western spadefoot is provided on pages 4.4-44 through 4.4-46. Surveys for western spadefoot were conducted in the PRSP area in 2005 and none were found. It is not necessary to conduct surveys for western spadefoot prior to finalizing the Draft EIR and is appropriate to conduct surveys prior to implementing individual development projects because wildlife species are dynamic. Even if surveys were conducted now, and the species was not found, it would be necessary to conduct preconstruction surveys at the time of future project implementation because suitable habitat is present and the SAP area is within the species' range.

Regarding impacts to wildlife species from night lighting, see response to comment 71-4.

16-7 The comment states the Draft EIR fails to identify and assess impacts to vernal pool plant species and dependent insect species.

There are no special-status bee species identified as potentially occurring in the area so the Draft EIR is not required to analyze impacts on bees. The dwarf downingia occurrence previously found in the PRSP area is small and disjunct from other downingia occurrences and therefore does not provide a significant source of nectar that would sustain a specialist pollinator. Since this species occurs in preserve areas within and adjacent to the SAP area, there would already be a source of nectar for the pollinator in those areas. The impact mechanism for loss of dwarf downingia in the planned development areas of the SAP area is not loss of pollinators but direct removal of dwarf downingia.

It is appropriate to delay any additional special-status plant surveys to the blooming period right before implementing individual development projects because the distribution of special-status plants can change over time. Past surveys found one special-status plant species in one vernal pool in the PRSP area and two special-status plant species in portions of the net SAP area that have already been preserved as part of the PCCP. These species could have spread to other vernal pools in the SAP area (including the PRSP area) or could have disappeared. Any survey is a snapshot in time. Considering the long planning horizon of the SAP (including the PRSP), special-status plants present in the SAP area today could shift in their abundance and distribution such that occupation changes prior to future independent development projects being implemented. For these reasons, surveys right before project implementation would be required anyway. Special-status plants can be extirpated naturally as a result of drought, climate change, or stochastic events, or as a result of non-development-related land management changes implemented by landowners (e.g., changes in agricultural practices).

16-8 The comment summarizes the CEQA requirements to maintain the administrative record and reminds the County of its obligations to maintain and preserve all documents and communications that may be part of the administrative record. Under CEQA, the administrative record (formally called the "record of proceedings") constitutes the entire body of evidence presented to the decision-making agency and considered, either directly or indirectly (through staff), by the agency in making their decision on a project. PRC Section 21167.6 presents the CEQA requirements, including who is responsible for preparing the administrative record, what items should be included, and when it should be prepared. The County is familiar with these requirements, having prepared numerous administrative records for previous projects, and adheres to these requirements for this and other County projects going through the CEQA environmental review process.

The comment also states that the Draft EIR identifies numerous significant and unavoidable impacts, but does not include feasible mitigation; therefore, the comment states that the project should not be approved in its current form. However, for the reasons discussed under responses to comments 16-1 through 16-7, the analysis is adequate and no changes to the Draft EIR are necessary in response to this comment.

LAW OFFICE OF
MARCUS J. LO DUCA
A Professional Corporation

Letter 17

MARCUS J. LO DUCA

February 22, 2019

Ms. Shirlee Herrington
Environmental Coordination Services
County of Placer
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

Re: Draft Environmental Impact Report for the Sunset Area Plan and Placer Ranch Specific Plan (State Clearinghouse No. 2016112012)

Dear Ms. Herrington:

This office represents CP 3500 Cincinnati, LLC and CP 3500 BLDG I, LLC, owner and builder/developer of the approximately 182 acre Placer Gold Industrial Park in the Sunset Industrial Area Plan (SIAP) at the northern terminus of Cincinnati Avenue. Taking over the empty shell of the former Formica building in the middle portion of the property, my client has expended in excess of $22 million to renovate and re-lease the former Formica building and construct the initial portions of the Placer Gold Industrial Park (PLN14-00138), approved on July 14, 2016. My client has completed the initial four lots in the Placer Gold project, including design review for the Lot 4 building, which building my client can now proceed to pull building permits for, as well as constructed the initial portion of the extension of Cincinnati Avenue into the project, and the western extension of the roadway off of Cincinnati Avenue that my client was required by the County to construct so as to be able to connect with the future Campus Park Boulevard in the Placer Ranch Specific Plan (PRSP).

My client's work to date has resulted in the leasing of all of the former Formica building, with such tenants as Consolidated Communications, JD2 Structures, 24HR Recreational Storage, SGX, and Airwolf, not to mention my client locating his own offices in the building. Thus, my client has a very keen and vested interest in the Sunset Area Plan (SAP), including the PRSP. My client is generally supportive of the County's

3200 DOUGLAS BOULEVARD, SUITE 300 • ROSEVILLE, CA 95661
TEL (916) 774-1636 • FAX (916) 774-1646
www.loducalaw.com

efforts in updating the SIAP, but has several comments regarding roadway connections, a change in land use in the eastern portion of the PRSP adjacent to Placer Gold, and mitigation measures set forth in the above-referenced EIR and their potential adverse impact on the ability of my client to continue to bring primary wage earner jobs to Placer County. Our specific comments follow.

Chapter 3 – Project Description

1. Page 3-33, Exhibit 3-11: In the January 2018 version of the Placer Ranch Specific Plan and Sunset Area Plan, the eastern terminus of Campus Park Boulevard connected directly with the western extension of the roadway that the Placer Gold project was required to build directly westward from the current terminus of Cincinnati Avenue. That western extension to Campus Park Boulevard would serve as a second point of access for the Placer Gold project, allowing more than the 460,000 square feet of industrial space on the property that is currently allocated without such second point of access, which limitation is the result of current roadway capacity issues in the eastern portion of the SIAP. Now, with the December 2018 version of the PRSP, that eastern portion of Campus Park Boulevard has swung northward by roughly 800 feet, so that now there is no connection to the Placer Gold roadway extension. This constitutes a significant change in the circulation plan for the Net SAP area, which does not appear to have been analyzed in the DEIR. Again, the County required the Placer Gold project to extend that roadway due west to connect to the future Campus Park Boulevard, which construction my client has nearly completed to a terminus in a cul-de-sac for future extension to the PRSP. My client cannot swing the roadway northward without significantly impacting biological resources and losing significant land for development, a particularly unacceptable result given that my client has already had to give up 12 acres at the northwestern corner of the property for Placer Parkway. We request that Campus Park Boulevard be relocated to where it was shown in the January 2018 version of the PRSP. 17-1

Chapter 4.3 – Air Quality

1. Page 4.3-39, Mitigation Measure 4.3-3c: For the Net SAP area, this measure calls for payment of an off-site mitigation fee equivalent to $0.86/square foot of non-residential space that is separate from the PCAPCD's current ROG and NOx off- 17-2

site mitigation fee. This additional fee of nearly $1.00 per square foot is a substantial burden on any industrial development in the SAP, and may well preclude further such development in approved and existing projects in the SIAP, seeming to conflict directly with one of the objectives for the SAP stated on page 3-6 of the Project Description to preserve the viability of industrial and large-scale manufacturing operations in the Sunset area. We question the requirement for a second off-site air quality mitigation fee when a substantial one is already required by the PCAPCD to allow applicants to mitigate their air quality impacts.

2. Page 4.3-46, Mitigation Measure 4.3-5a: This measure calls for, among other requirements, that developments be designed so that truck loading/unloading facilities and sensitive receptors are not located within 1,000 feet of each other, which facilities are defined to include truck distribution yards, truck loading docks, or truck loading or unloading areas. My client has an approved project and industrial zoning and land use designations, not to mention significant development already constructed in the Placer Gold project. Unlike the January 2018 version of the PRSP, which had Campus Park land use in the PRSP adjacent to the western portion of Placer Gold, the December version of the PRSP has now located Low Density Residential land uses adjacent to the western boundary of my client's property, and much closer than 1,000 feet away, even with the landscape buffer shown in the PRSP adjacent to my client's property. This new requirement on the Net SAP area could have a very direct, adverse impact on future industrial development in the Industrial Infill District of the SAP, and we ask that this measure be deleted for properties in the Industrial Infill District adjacent to the PRSP. Moving sensitive receptors next to long-designated and zoned industrial properties, and then making those industrial properties mitigate what the residential properties might object to, runs directly contrary to the stated objectives and goals of the SAP and over two decades of County policy.

17-2 cont.

Chapter 4.7 – Greenhouse Gas Emissions

1. Page 4.7-21, Mitigation Measure 4.7-2b: This mitigation measure, on top of the additional off-site mitigation fee of $0.86/square foot in Mitigation Measure 4.3-3c, is based on guidance from the PCAPCD and the California Air Resources Board, but is not required to be implemented by Placer County. This measure represents yet another burden on industrial developments like Placer Gold as

17-3

they look to compete with other parts of the region and other states to bring primary wage earner jobs to Placer County. 17-3 cont.

Chapter 4.10 – Land Use

1. Page 4.10-12, Impact 4.10-1: There is no discussion here of the potential land use incompatibility created by moving Low Density Residential uses in the PRSP adjacent to industrial properties in the existing SIAP such as my client's Placer Gold project. That impact needs to be analyzed. 17-4

Chapter 4.13 – Public Services

1. Page 4.13-27, Mitigation Measure 4.13-1a: Currently, development in the SIAP is subject to the special taxes in CFD 2012-1 for fire services. It is not clear from the DEIR if that CFD, to which Placer Gold was required to annex into, satisfies this mitigation measure, or if this is yet another layer of a CFD for fire service in the proposed SAP! 17-5
2. Page 4.13-30, Mitigation Measure 4.13-2: The DEIR calls for all new development in the PRSP and Net SAP area to fund law enforcement services through a CFD or CSA, but nowhere in the DEIR or its appendices is an analysis of the significant property tax revenues that would be generated by new non-residential development, and how those revenues would offset the cost of providing services such as law enforcement. 17-6
3. Page 4.13-40, Mitigation Measure 4.13-8: The DEIR calls for all new development in the PRSP and Net SAP area to fund road maintenance through a CFD or CSA, but again, nowhere in the DEIR or its appendices is there any analysis of the significant property tax revenues that would be generated by new non-residential development, and how those revenues would offset the cost of providing road maintenance services in the SAP. 17-7

My client has spent millions of dollars and many years bringing primary wage earners jobs to the SIAP, on a property served by water and sewer infrastructure, as well as rail service. The Placer Gold project is one of the few projects in the SIAP that has brought in significant new employers into the SIAP, and our comments herein are intended to help allow my client and the County to continue to be competitive in the region and the nation in attracting employers to the SIAP . 17-8

Thank you for the opportunity to comment on the DEIR.

Very truly yours,

LAW OFFICE OF MARCUS J. LO DUCA
A Professional Corporation

Marcus J. Lo Duca

Cc: CP 3500 Cincinnati, LLC
CP 3500 BLDG I, LLC

Letter 17	CP 3500 Cincinnati, LLC, and CP 3500 BLDG I, LLC Marcus J. Lo Duca, Law Office of Marcus J. Lo Duca February 22, 2019

17-1 The comment expresses concern regarding the alignment of the eastern terminus of Campus Park Boulevard within the PRSP area. The Campus Park Boulevard alignment illustrated in Exhibit 3-11 is conceptual in nature in that the actual precise alignment will be determined with implementation of the PRSP. To ensure Campus Park Boulevard is aligned to connect with Campus Park Boulevard infrastructure already constructed as part of the Placer Gold project to the east of the PRSP area, a Condition of Approval has been added to the PRSP Tentative Large Lot Map.

17-2 The comment suggests that the off-site mitigation fee required by Mitigation Measure 4.3-3c may be a substantial burden on developers and that such requirement would make the mitigation measure infeasible. The comment does not provide evidence that this fee is financially infeasible. The comment questions the need for a second off-site air quality mitigation fee for the project; however, these fees would offset the impacts of the project's air pollutant and greenhouse gas emissions. The available on-site mitigation is insufficient to reduce project-generated emissions below PCAPCD's thresholds, off-site mitigation is preferred by PCAPCD in the form of contributions to the Offsite Air Quality Mitigation Fund. This mitigation is considered feasible by PCAPCD. This comment is noted and will be considered by decisionmakers in determining whether mitigation is feasible.

The comment discusses an approved industrial project in the SAP that would be inconsistent with Mitigation Measure 4.3-5a because new residential development could occur within the identified 1,000-foot buffer. To clarify, currently approved projects would not be subject to the mitigation required by this Draft EIR. The County has revised Mitigation Measure 4.3-5a, as follows, to address currently planned industrial expansions in the net SAP area and to provide specific measures for residential development that may be proposed near existing/planned industrial development:

Mitigation Measure 4.3-5a: Incorporation of design features ~~at truck loading areas~~ to reduce health-risk exposure at sensitive receptors (Net SAP Area and PRSP Area)

~~Before Design Review approval~~ Prior to Design Review approval and/or issuance of grading permit, ~~project proponents shall design developments~~ new development shall be designed so that truck loading/unloading facilities ~~and sensitive receptors~~ are not located within 1,000 feet of ~~each other~~ existing or planned sensitive receptors, if feasible considering site design parameters. Existing or previously approved industrial/commercial development, including any development within boundaries of existing industrial parks, are not subject to this mitigation measure. For the purpose of this mitigation measure, a truck loading/unloading facility is defined as any truck distribution yard, truck loading dock, or truck loading or unloading area where more than one truck with three or more axles will be present for more than 10 minutes per week, on average; and sensitive receptors include residential land uses, campus dormitories and student housing, residential care facilities, hospitals, schools, parks, playgrounds, or daycare facilities. A truck loading/unloading facility ~~and a sensitive receptor~~ can be located within 1,000 feet of ~~each other~~ a sensitive receptor only if ~~a project proponent~~ the project applicant prepares a qualified, site-specific HRA showing that the associated level of cancer risk at the sensitive receptors would not exceed 10 in 1 million. The HRA shall be conducted in accordance with guidance from PCAPCD and shall be approved by PCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. Design measures may include but are not limited to the following:

- Implement Mitigation Measure 4.3-3a, which requires all truck loading/unloading facilities to be equipped with one 110/208-volt power outlet for every two-truck loading/unloading facility. A minimum 2-foot-by-3-foot sign shall be clearly visible at each loading dock that indicates, “Diesel engine idling limited to a maximum of 5 minutes.” The sign shall include instructions for diesel trucks idling for more than 5 minutes to connect to the 110/208-volt power to run any auxiliary equipment. This measure is recommended in PCAPCD’s *CEQA Handbook* (PCAPCD 2017a) and is also consistent with measure VT-1 in the CAPCOA guide (CAPCOA 2010:300–303).

- The use of electric-powered “yard trucks” or fork lifts to move truck trailers around a truck yard or truck loading/unloading facility.

- The use of buildings or walls to shield commercial activity from nearby residences or other sensitive land uses.

- The use of EPA-rated Tier 4 Final engines in diesel-fueled construction equipment when construction activities are adjacent to existing sensitive receptors.

- Plant and maintain a vegetative buffer between the truck loading/unloading facility and nearby sensitive residences, schools, and daycare facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

Applicants of residential or commercial development with new sensitive receptors proposed to be located within 1,000 feet of existing and/or planned commercial/industrial facilities that include, or may include, truck loading/unloading facilities, shall prepare an HRA as described above. Design measures identified in the HRA may include but are not limited to the following:

- Redesign the project to increase the distance between sensitive receptors and potential truck loading/unloading facilities;
- Use of upgraded filtration systems in the residential HVAC systems;
- Use of intervening buildings or walls to shield the receptors from the truck loading/unloading facility;
- Plant and maintain a vegetative buffer between sensitive receptors and the truck loading/unloading facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.

Also see response to comment 17-4, below, for a discussion regarding Placer County General Plan Land Use Buffer Standards.

17-3 The comment suggests that the carbon offset mitigation fee that is required by Mitigation Measure 4.7-2b is burdensome on industrial development and is not required by Placer County but rather is based on guidance from the PCAPCD and the California Air Resources Board (CARB). Placer County is the lead agency under CEQA for this project and must consider all feasible mitigation for significant environmental impacts. Impact 4.7-2 identifies a significant impact that must include all feasible mitigation. In certain instances, the County does not have its own guidance for specific resource areas and relies on resource agencies to provide guidance for available, feasible, and effective mitigation measures. For air pollutant and GHG emissions, the PCAPCD provides the County with such guidance, which has been used in Mitigation Measure 4.7-2b. Additionally, the comment does not provide evidence that the mitigation fee is financially infeasible. The comment will be considered by decisionmakers in determining whether mitigation is feasible.

17-4 The comment asserts that the Draft EIR does not analyze potential land use incompatibility associated with the PRSP's proposed low-density residential uses adjacent to industrial properties in the existing Sunset Area. Impact 4.10-1 describes the PRSP's proximity to existing commercial and industrial uses to the east, where it is mostly undeveloped with some areas of existing commercial and industrial uses and that these areas are planned for eventual commercial and industrial development. Existing industrial structures are located approximately 1,000 feet from planned residential development in the PRSP area. New or substantially expanded industrial projects located in the SAP would be required to comply with SAP policies, including Policy 6.F.11, which states "the County shall apply the buffer standards described in Part 1 of this Policy Document [Land Use/Circulation Diagrams and Standards] and meteorological analyses to provide separation between possible emission/nuisance sources (such as industrial and commercial uses) and residential uses."

Any future development within the PRSP area would be subject to Placer County General Plan Land Use Buffer Standards Section 2m which outlines buffer zones and provisions to be applied for residential development adjacent to industrial. The buffer dimensions state that generally a minimum buffer zone width of 300 feet would be required but may be reduced to not less than 100 feet where the buffer includes landscaping features. These standards would apply to the PRSP residential land use zones that are adjacent to the industrial zones located within the net SAP area to the east. Accordingly, as proposed, the PRSP land use plan includes a 100-foot buffer zone along the eastern residential zone.

The Draft EIR evaluates impacts associated with environmental-related land use conflicts between industrial uses and residential uses (sensitive receptors). For example, Impact 4.3-5 of the Draft EIR specifically evaluates impacts to sensitive receptors associated with sources of Toxic Air

Contaminant emissions (including sources associated with industrial development). To reduce project-related impacts, the Draft EIR identifies Mitigation Measure 4.3-5a which requires developments to be designed such that truck loading/unloading facilities and residential areas are not located within 1,000 feet of each other. The mitigation specifies that truck loading/unloading facilities and residential development may be located within 1,000 feet if the project proponent prepares a qualified, site-specific health risk assessment (HRA) showing that the associated cancer risk at the sensitive receptor would not exceed 10 in 1 million. See Draft EIR page 4.3-46 for more details. Note that Mitigation Measure 4.3-5a has been revised (as shown in response to comment 17-2, above) to address currently planned expansion of existing industrial uses.

17-5 The comment questions whether development in the SAP area currently annexed into CFD 2012-1 for fire services would satisfy the requirements of Mitigation Measure 4.13-1a, or if existing development would be required to annex into another CFD as part of the SAP. Existing development already part of a CFD would not be required to annex into another CFD for the same purpose.

17-6 The comment notes that the Draft EIR does not contain an analysis of property tax revenues that would be generated by new non-residential development, and how those revenues would offset the cost of services, such as law enforcement. Placer County General Plan Policy 4.B.6 requires a fiscal impact analysis be prepared for those projects proposing 100 units or more of residential development. A fiscal impact analysis prepared for both the PRSP area and the net SAP area examined the incremental increase in property tax and other revenues attributable to the planned uses that could be used to offset increased service level costs to serve such proposed development. This comment raises questions regarding the financial aspects of the project, including tax revenue generation. The comment does not raise issues related to environmental impacts or adequacy of the Draft EIR.

17-7 The comment notes that the Draft EIR does not contain an analysis of property tax revenues that would be generated by new non-residential development, and how those revenues would offset the cost of providing road maintenance. See response to comment 17-6.

17-8 The comment notes that the Placer Gold Industrial project located to the east of the PRSP area has provided significant investment to the SAP area and brought employers to the region. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration.

LEGAL SERVICES of NORTHERN CALIFORNIA

Letter 18

February 22, 2019

Placer County Planning Commission
3091 County Center Drive, Suite 190
Auburn, Ca. 95603

Re: Sunset Area Plan & Placer Ranch Draft Environmental Impact Report

Dear Planning Commission Members:

On behalf of our clients, thank you for this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Sunset Area Plan/Placer Ranch Specific Plan (SAP/PRSP).

Legal Services of Northern California is the non-profit corporation providing free civil legal aid for low-income residents of Placer County. As a result of our caseload demand in Placer County, we have come to recognize that the lack of affordable housing has created a housing crisis for our clients. In addition, it negatively impacts our community in many ways. These comments will focus on the affordable housing aspects discussed in Section 4.12 of the DEIR.

1. The DEIR should specify that compliance with the County's housing policies is a required mitigation measure.

The population and housing sections in most specific plan EIRs approved by the County used the County housing policies as a mitigation measure to reduce the potential impact of the project to less than significant. The PRSP DEIR proposes to adhere to County housing policies, and concludes at Impact 4.12-2 that because of this consistency the project impact would be less than significant. For purposes of consistency with the County's past practices the PRSP DEIR should incorporate the County policies as mitigation measures. 18-1

2. The need for affordable housing should be recognized and address in the DEIR.

The plan acknowledges that the County is obligated to provide enough land to meet the SACOG fair share housing allocation of 5,031 units. However, it fails to specify that 3,258 of these units should be affordable to very low, low, and moderate-income households, and that only 193 units have been built in these income categories during this planning period. As a result, it is imperative that the PRSP make specific provisions for the commitment to develop affordable housing. 18-2

Mother Lode Regional Office:
190 Reamer Street
Auburn, CA 95603
P: 530.823.7560
F: 530.823.7601
www.lsnc.net

A Legal Services Corporation Program LSC

At page 4-12-11, the DEIR states that in the PRSP area, 10 percent of housing would be affordable as required by the County's Housing Element, and that the additional 8,094 proposed units would likely meet the County's RHNA allocation. However, without specificity, there can be no guarantee that the plan will meet the RHNA allocation for *affordable housing* or comply with the Housing Element. On its face, compliance with the Housing Element would produce 809 affordable units in the SAP (10% of the total), which would not meet the RHNA allocation for affordable housing, nor would it meet the actual need for affordable housing. Regardless, the 10% contribution would be significant and the project should commit to the actual construction of the affordable units. 18-2 cont.

3. Location of Affordable Housing in the project should be identified.

The DIER must specifically state the anticipated location and timing for the affordable housing development. The decisions regarding these specifics must be stated in the current DEIR and not deferred to a later date.

As referenced in the DEIR (p. 4-12-7), the Housing Element requires that the affordable housing be constructed on-site and dispersed throughout the project to the extent possible. The DEIR does not specify the location of the affordable units. In addition, the DEIR should indicate the location of proposed affordable housing in relation to the disposal site (WRSL), flood plains areas, and infrastructure and transit sites. The plan does not identify the location of the infrastructure and transit sites. This information is critical, because the proximity to these sites will play a critical role in determining whether the affordable housing will meet the governmental requirements to qualify for supportive funding, which will determine whether the affordable housing is built and the level of affordability. 18-3

Impact 4.3-6 at Table 2-1 of the Executive Summary identifies that the project will create objectionable odors affecting a substantial number of people. The project proposes an amendment to the County General Plan Policy 4.G.11 which reduces the 1-mile buffer for residential uses around the WRSL to 2000 feet, and subject to approval, to 1000 feet. The record shows that the County Air Quality Agency has already received approximately 300 complaints about the odor from the WRSL, and the summary concludes that there will be an increase in complaints from new residents. This is a significant environmental impact that should be mitigated. In addition, location of the proposed affordable housing should be identified to insure that it would be dispersed throughout the project area and not concentrated near the WRSL. Concentration of housing near the WRSL would affect the ability of affordable projects to qualify for funding and would constitute environmental discrimination by requiring affordable residents to bear the brunt of this significant impact.

4. Timing of the affordable housing development must be specified.

The Housing Element at Police B-6 requires that affordable housing must be developed in a timely manner with the market-rate units in the project to avoid delaying the construction of the affordable units to the end of the project. The DEIR must specify the time frame for the construction of the affordable units to comply with this policy. Failure to do so could result in the delay of the affordable units, which could in turn result in a barrier to construction due financial obstacles and neighborhood opposition, including litigation, from the residents of the market rate units. 18-4

5. The jobs to housing ratio should be analyzed.

The jobs to housing ratio discussed at Impact 4.12-1 concludes that the buildout of the SAP and PRSP areas would result in 55,760 new jobs, and that the projects will add more than seven jobs for each dwelling unit. The DEIR concludes that this will improve the jobs-to-housing ratio in Placer County. However, the DEIR does not analyze whether the salaries from the newly created jobs would be sufficient to allow the workers to afford the housing created in the project. Without this analysis, one cannot determine whether the project 18-5

improves the jobs-to-housing balance, or merely creates another community where workers are required to commute into the project area, because they cannot afford to live there. 18-5 cont.

6. Density Bonus obligations must be specific and explained.

The Specific Plan for this project included a density bonus granted by Placer County. However, the DEIR does not spell out the developer's obligations, especially with respect to affordable housing, stemming from the density bonus. These specifics need to be spelled out. 18-6

Please take these comments into consideration. If this project is properly planned and implemented, it holds the potential to provide many positive contributions to Placer County, especially by helping to mitigate our affordable housing crisis. Thank you for this opportunity to comment on this project.

Sincerely,

W. H. Whitaker

Managing Attorney

Letter 18	W.H. Whitaker, Managing Attorney, Legal Services of Northern California (representing unidentified clients) February 22, 2019

18-1 The comment suggests incorporating applicable housing policies into mitigation measures. Applicable Placer County General Plan Housing Element policies are identified on page 4.12-7 of the Draft EIR, including Policies A-4, A-5, B-4, and B-13. County General Plan policies have been approved by the Board of Supervisors, and the County implements its General Plan policies. General Plan policies do not need to be adopted as mitigation measures in order to be successfully implemented. No revisions to the Draft EIR are necessary.

18-2 The comment states there is no guarantee the plan would comply with the RHNA allocation for affordable housing or that the PRSP would make specific commitments to develop affordable housing. Section 3.4.2 of the Draft EIR identifies that one of the primary objectives of the PRSP is to meet regional housing needs allocation. As described in Section 4.12.2 of the Draft EIR, the SAP/PRSP would aid Placer County in achieving the County's obligation to provide enough land with densities to accommodate the County's assigned fair share of the region's housing needs by designating districts with densities of 30 dwelling units/acre. General Plan Housing Element Policies B-4 and B-15 requires 10 percent of the housing inventory within the Specific Plan to be restricted to affordable rates and constructed within the project area.

18-3 The comment requests the EIR identify the anticipated location for affordable housing and suggests the locations of affordable housing in relation to floodplains, public transit, and concentration of affordable housing near the landfill, could affect the project's ability to qualify for governmental supporting funding. The comment further states that odor impacts related to the reduction of the County's existing 1-mile buffer for development near the landfill is a significant environmental impact that should be mitigated.

As described in Section 6 of the PRSP, the project's affordable housing obligation is 564 units. The anticipated location of affordable housing would be dispersed within the residential zone districts as shown in Exhibit 3-1. The affordable housing sites are located ¾ mile and more away from the active landfill site. Exhibit 3-6 shows the locations of affordable housing in the PRSP area.

With regard to floodplains, existing Placer County natural resources protections and Draft EIR Mitigation Measures 4.9-5a, 4.9-5b, and 4.9-5c effectively prohibit disturbance and placement of habitable structures in the 100-year floodplain.

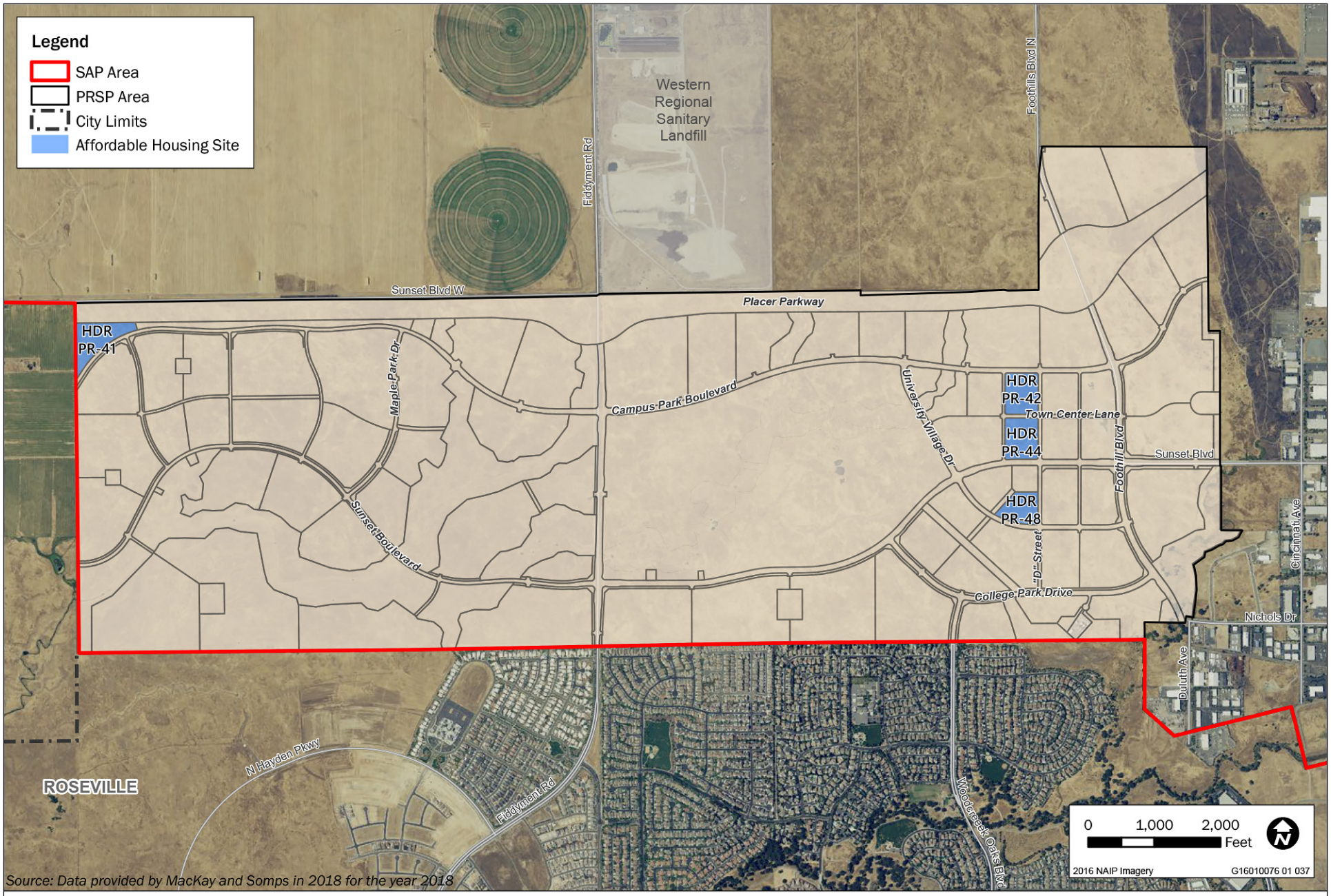
With regard to infrastructure and transit, see Draft EIR Exhibits 3-15 through 3-24, which show locations of roads, traffic control, bicycle/mobility features, public transit facilities, potable water infrastructure, recycled water infrastructure, wastewater infrastructure, stormwater drainage infrastructure, electrical infrastructure, and infrastructure located outside the PRSP area. Also, in Chapter 9 of the PRSP, Figures 9-1 through 9-5, show identified locations of utilities and infrastructure within the PRSP area. Similarly, Chapter 7, Figure 7-11, identifies the location of public transit routes and stops along arterial streets throughout the PRSP area, including Campus Park Boulevard, Sunset Boulevard, Fiddyment Road, and Foothills Boulevard.

With regard to odor, the Draft EIR includes analysis of odors in three different sections: 4.3, "Air Quality"; 4.10, "Land Use"; and 4.15, "Utilities." The Draft EIR identifies mitigation measures to reduce odors, specifically Mitigation Measure 4.10-2. Also, see Master Response 4: Odors. Note that the master response includes an additional mitigation measure to further address odor impacts. It should be noted that landfill proximity, itself, as well as exposure to odors, are not considerations with respect to HUD funding for affordable housing.

18-4 The comment requests the timing for construction of affordable housing be provided. Project-specific timing and triggers identifying affordable housing construction requirements are established in the PRSP Development Agreement and would not inhibit the timing for construction of affordable units, consistent with Housing Element Policy B-6. Exhibit 3-6 shows the locations of affordable housing in the PRSP area.

18-5 The comment states that the Draft EIR does not analyze whether the salaries from the newly created jobs would allow the workers to afford housing created in the project area, and, therefore, it is unclear whether the project would improve the jobs-to-housing balance. The Sacramento region's labor force is composed of employees with a range of skills and experience who receive compensation commensurate with their skills and experience and aligned with the region's labor force demands and cost of living. The SAP is being planned to include a variety of nonresidential land uses with future employers offering retail, office, and industrial employment opportunities requiring a range of skills and experience. At this time, specific employers and employment opportunities in the project area are unknown. However, future employers in the project area will compete with other employers in the region. Thus, it will be necessary for these employers to offer competitive wages to successfully attract employees from the region's labor force.

18-6 The comment suggests that the Draft EIR provide the specific additional obligations for affordable housing stemming from the project's density bonus. The County has not granted a Density Bonus to the project, although, as described in Section 6.C of the PRSP additional units may be assigned to the PRSP in accordance with Placer County Zoning Ordinance 17.54.120. Development that occurs within the PRSP area may propose to utilize residential density bonuses and incentives consistent with provisions of California Government Code Section 65915, without requiring an amendment to the PRSP.



Source: Data provided by MacKay and Somps in 2018 for the year 2018

Exhibit 3-6 **Affordable Housing Locations in PRSP Area**

PLACER ATHENS LP/PLACER ATHENS II LP

Letter 19

February 12, 2019

Ms. Shirlee Herrington
Environmental Coordination Services
County of Placer
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

RE: Sunset Area Plan/Placer Ranch Specific Plan Draft EIR

Dear Ms. Herrington:

Placer Athens LP and Placer Athens II LP own 400 acres east of the 180-acre buffer property to the Western Placer Regional Landfill. Our property has been designated for urban non-residential land use (Industrial) under the Sunset Industrial Area Plan (SIAP) since that plan's adoption in 1997, with Industrial Park zoning on a portion of our property. Since acquiring the property in 2002, we have been challenged in seeking to develop our property under the SIAP due to the lack of available infrastructure in the plan area. The infrastructure needed to allow development to move forward is of such a magnitude that no individual project can bear the costs of such infrastructure. We have been anxious for infrastructure planning in the area to proceed that would fairly and equitably spread the costs of necessary infrastructure among the various properties in the SIAP, so no individual property owner has to bear the burden of mitigating someone else's impacts.

As long-time property owners in the plan area, we have been supportive of the County's plans to update the SIAP and re-focus land use planning in the area under the proposed Sunset Area Plan (SAP). The SAP proposes on most of our property to be designated Innovation District, along with our northeastern corner to be designated Entertainment Mixed Use. While supportive of the SAP and what it can do to help spur development in the plan area, we have serious concerns with several provisions of the Draft EIR for the SAP and the Placer Ranch Specific Plan. Our concerns fall into two areas: mitigation for the landfill operational issues, and new burdens placed on development in the SAP. In the first case, the mitigation discussed in one area of the Draft EIR would in essence result in the taking of our property to mitigate another property owner's impacts. In the second case, the additional burdens being placed on future development in the SAP could well undermine the ability to develop the type of projects that the County and property owners want to see built in the SAP. 19-1

As well documented in the Draft EIR, the Western Placer Regional Landfill is the source of significant and unmitigated odor issues in the SIAP and surrounding area, which impacts affect the ability of property owners such as ourselves to be able to develop our properties. While the Draft EIR suggests on page 4.3-52 several mitigation measures that the Waste Management Authority could

~ 1 ~

implement to begin to address significant odor impacts from the landfill and composting operations, the Draft EIR notes that such measures are outside the County's control, and so the impacts are significant and unavoidable. While the Draft EIR discusses briefly at page 4.3-11 future landfill operations, the text only in passing notes that the Waste Management Authority is considering expansion of its operations either to the west of the existing landfill operations or to the east of such operations, to property purchased in 2009 by the Waste Management Authority as buffer land. That buffer land lies immediately to the west of our property. The proximity only makes the suggested mitigation on page 4.10-18 of the Draft EIR that much more ominous. Mitigation Measure 4.10-2 in its Landscape Design measures states "require a landscape buffer zone on all land uses adjacent to the WRSL." In other words, the Draft EIR recommends externalizing the buffer from the operations of the landfill to other property owners such as ourselves.

The requirement for surrounding property owners such as ourselves to have to mitigate the impacts of the landfill's operations flies in the face of legal prohibitions against precisely the concept of externalizing the impacts of a project onto other property owners. The Waste Management Authority has to mitigate its own impacts. When the Authority purchased the property adjacent to our property in 2009, we believed that the Authority was buying the land to buffer the impacts of its operations. Now, one option being studied by the Authority is to expand the landfill operations eastward onto to its acquired buffer land property. And the County's SAP Draft EIR is compounding the impact of such a proposal by placing mitigation on properties in the SAP to buffer the operations of the landfill on our property. Such an externalized buffer renders that part of our property useless and undevelopable. As such, the measure serves to take our property to provide a buffer for the impacts of another property owner's project. We cannot and will not accept such a measure. We therefore request that this measure be deleted from the EIR in the Final EIR.

19-1 cont.

The second area of concern with the Draft EIR has to do with additional community facilities district requirements for properties in the SAP to finance ongoing costs of various government services. Properties in the SIAP are already required to join CFD No. 2012-1 to fund fire services in the SIAP, but the Draft EIR calls for adding to the services funded by such a CFD to include law enforcement (Mitigation Measure 4.13-2 on page 4.13-30), library services (Mitigation Measure 4.13-4, page 4.13-35), and road maintenance (Mitigation Measure 4.13-8, page 4.13-40). Yet, nowhere in the Draft EIR is found any discussion of the property taxes that non-residential development that can be built on our property can generate to offset any costs on law enforcement, libraries and road maintenance. Such measures placed on properties in the SAP can serve to place the SAP area at a significant competitive disadvantage compared to other areas in the greater Sacramento region. We ask the County to include a fiscal study of the expected revenues to be generated by new non-residential development in the SAP, both one-time revenues and ongoing property tax and sales tax revenues. Then the County can determine the costs of such services that will be paid for by future non-residential development through the property taxes and sales taxes from such development, thereby allowing the County to eliminate the layering of CFD costs on non-residential development in the SAP as currently proposed.

19-2

Thank you for the opportunity to comment on the Draft EIR.

Sincerely,

Tim Kwan Daniel Lee

Letter 19	Placer Athens LP/Placer Athens II LP Tim Kwan and Daniel Lee February 12, 2019

19-1 The commenters claim that the mitigation proposed in the Draft EIR would result in a taking of their property. In accordance with State CEQA Guidelines Section 15126.2(a), "[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment." Section 15358(b) notes that "[e]ffects analyzed under CEQA must be related to a physical change." The comment regarding takings can be considered by decisionmakers, but such an impact is outside the scope of the EIR; therefore, no revisions have been made to the Draft EIR in response to this part of the comment.

The commenters also note "significant and unmitigated odor issues in the [Sunset Industrial Area Plan] and surrounding area" and then discuss mitigation measures proposed in the Draft EIR. To clarify, mitigation in the Draft EIR is for impacts that would result from the proposed project. The mitigation is not to address existing odor issues associated with the WRSL. See Master Response 4: Odors for a discussion of mitigation of impacts related to the project and the WRSL. See also Master Response 9: Mitigation and Development Fees.

19-2 The comment questions the need for additional community facilities district requirements and requests the County to provide a fiscal study of the expected revenues to be generated by new non-residential development. See response to comment 17-6.

Letter 20

Placer Community FOUNDATION

phone: 530-885-4920
mailing: P.O. Box 9207 • Auburn, CA 95604 office: 219 Maple St., Suite 200 • Auburn, CA 95603
www.placercf.org

February 20, 2019

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Ms. Shirlee Herrington, Environmental Coordination Services
Placer County, Community Development Resources Agency
3091 County Center Drive, Ste. 190
Auburn, CA 95603

RE: Comments- Draft EIR for the Proposed Sunset Area Plan/Placer Ranch Specific Plan Project

Dear Ms. Herrington:

Thank you for allowing the community to give comment to the above mentioned project. As you know, the County has severe shortage of affordable workforce housing and given the nature and size of this project, affordable housing should be prioritized.

Although high density doesn't necessarily mean affordable, why was the number of high density residential units reduced from the original plan?

The EIR fails to provide a detailed jobs/housing balance analysis that evaluates whether the plan provides sufficient housing to accommodate the salaries of the new workforce in the plan area

The EIR states the plan will comply with the County's requirement of providing 10 percent of residential units in specific plans be affordable But the EIR doesn't provide specifics on how it will implement housing policies B-4, B-6, and B-13. Will the affordable units be spread throughout the different subdivisions or concentrated in one area?

The EIR should clarify that Student housing will not count towards the developments affordable housing requirements

20-1

In-lieu fees should not be permitted for a project of this size and scope. Further, a nexus study to determine fee in lieu has not been adopted by the Board of Supervisors.

The project's impact to affordable housing will be significant and housing element policy should be used as a mitigation measure to help reduce the severity of this impact. As required by Government Code 65454, a specific plan needs to be consistent with the county's general plan. This project should be consistent with other project EIRs in the County.

Given the challenges of constructing affordable housing and the subsidies needed to get units constructed, affordable units should receive priority for access to infrastructure, transit and should not have the additional costs associated with being located in the flood plain.

It doesn't appear that any land has been set aside for future light rail or some form of mass transit (other than bus stops). Which is also necessary to meet the needs of residents in affordable housing.

Is the housing density high enough to support rapid transit?

20-1 cont.

We appreciate the opportunity to comment.

Sincerely,



Veronica Blake, CEO
Placer Community Foundation
PO Box 9207
Auburn, CA 95604

VB/fd

Letter 20	Placer Community Foundation Veronica Blake, CEO February 20, 2019

20-1 The comment questions why the number of high-density residential units was reduced from previous plan iterations and claims the Draft EIR fails to provide a detailed jobs/housing balance analysis to determine whether the new workforce can afford to live within the project area. The comment further questions how Housing Element Policies B-4, B-6, and B-13 would be implemented and requests the anticipated location for construction affordable housing be identified and that an in-lieu fee should not be permitted for projects of this scale. Additionally, the comment requests clarification that student housing does not count toward the project's affordable housing obligations. Finally, the comment suggests mass transit is necessary for affordable housing residents and questions whether the project's density is high enough to support rapid transit.

This comment raises similar issues as comment letter 18. See responses to comment letter 18. Also, a given housing market comprises households with a range of incomes capable of affording a range of housing costs. Housing markets also contain a range of housing typologies (e.g., size; density; tenure; market-rate; subsidized) to meet different segments of demand. Similar to the Sacramento regional housing market, the project is envisioned to contain housing options at various price points thereby providing a range of housing options that could accommodate a range of salaries. These housing options include single-family homes of mixed densities, high-density multifamily homes, student housing, and subsidized affordable housing.

The project is being planned to include a variety of nonresidential land uses, with future employers offering retail, office, and industrial employment opportunities requiring a range of skills and experience. At this time, specific employers and employment opportunities are unknown but it would be necessary for these employers to offer competitive wages to successfully attract employees from the region's labor force.

Letter 21

PLACER COUNTY

SOLID WASTE LOCAL TASK FORCE

Devin Whittington, Chairman

RECEIVED
FEB 19 2019
CDRA

February 13, 2019

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

Subject: Sunset Area Plan/Placer Ranch Specific Plan Draft EIR (State Clearinghouse No. 216112012)

Dear Board of Supervisors:

The Solid Waste Local Task Force (SWLTF) was established by the Board of Supervisors in 1990 to advise the Board on matters related to solid waste. The SWLTF is an advisory committee which, among other things, reviews and comments on proposed actions, programs, and facilities that affect the management of solid waste and diverted materials in Placer County. Membership of the SWLTF includes representatives from the cities of Roseville, Rocklin, Lincoln, Auburn, and Colfax, Town of Loomis, two franchise waste haulers, landfill and Material Recovery Facility (MRF) operators, the County Board of Supervisors, County Planning Commission, an environmental group, and the general public.

The SWLTF writes to respectfully provide the Board with the following comments on the Sunset Area Plan/Placer Ranch Specific Plan (Project) Draft Environmental Impact Report (EIR). The Project would modify the existing land use buffer standards that apply to solid waste facilities, potentially allowing residential and commercial uses much closer than currently allowed to the Western Regional Sanitary Landfill (Landfill) and MRF.

As described in detail in Chapter 3, "Project Description", the Project proposes an amendment to General Plan Policy 4.G.11, the purpose of which is to protect landfill facilities from incompatible encroachment. The policy currently requires that "new residential land uses…be separated from the property lines of active and future landfill sites by a buffer of one mile, or 5,280 feet." The proposed policy would allow residential development as close as 1,000 feet to the Western Regional Sanitary Landfill (WRSL) with approval of a specific plan, master plan, or a development agreement with certain requirements. Without a specific plan or development agreement, the minimum buffer zone would be 2,000 feet. 21-1

The sensitive receptors that would be developed within the landfill buffer zone would be:

- 5,827 Family homes
- 1 Elementary school
- 1 Middle school
- 1 State University for 30,000 students

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The SWLTF has significant concerns with the proposed modification to the buffer zone and urges the County to maintain and enforce existing General Plan Policy 4.G.11 for the reasons outlined in this letter.

The Landfill and MRF are crucial public facilities.

These facilities are owned and operated by the Western Placer Waste Management Authority (Authority) which is a Joint Powers Authority comprised of County of Placer and the cities of Lincoln, Rocklin and Roseville. They provide the primary waste disposal and recycling services for the majority of Placer County. The MRF has been key in enabling Placer County jurisdictions to comply with state laws, such as AB 939, which mandates jurisdictions divert 50 percent of their waste from landfills or face fines of up to $10,000 per day.

21-1 cont.

Encroaching development could hinder future expansion of Landfill and MRF.

Currently, the Authority is developing future expansion plans for the Landfill and MRF to meet future disposal and recycling needs of the County. The SWL TF asks that you consider this as you approve new specific and area plans in proximity to the landfill. Once incompatible development is in place, it will be considerably more difficult for WPWMA to gain the necessary approvals to expand.

Finding alternative facilities will significantly increase cost impacts on citizens.

If the County is forced to utilize alternative, out of county options for disposal and recycling, it will significantly increase ratepayer costs due to hauling waste longer distances. In addition, complying with extensive new mandates would be difficult as there is a statewide shortage in organics processing facilities and the facilities and programs would be entirely outside local control.

21-2

These concerns are elaborated on in the SWLTF's previously submitted comment letter, dated May 3, 2018, and attached herein.

The current buffer zone was the subject of a court case.

The Task Force strongly requests the County to be mindful of previous litigation regarding the one mile buffer around the landfill. The Placer County General plan was updated in August 2003 and included the one-mile buffer to protect the landfill. The EIR should explain what has changed that enables Placer County to now support a reduction in the buffer whereas they adopted the current one-mile buffer in 2003.

21-3

The following are specific comments on sections of the EIR that we are highlighting for your attention and that support our concerns outlined above:

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Chapter 4.3 Air Quality

1. **Section 4.3.2 Environmental Setting - Odors**

Page 4.3-6 – Odors. The SWLTF supports the EIR's acknowledgement of the ways that odor can impact people, e.g. that "a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache)." The SWLTF urges the County to consider that the Project, by bringing land uses in closer proximity to the landfill, will expose the sensitive receptors listed above to these conditions as part of their daily lives.

Page 4.3-8 – Odors Complaint / Notification History. The SWLTF also supports the County's decision to, while not strictly required to do so, evaluate and draw significant conclusions with respect to impacts of existing odor sources on future residents and visitors. Table 4.3-3 in the EIR lists the number of complaints filed due to odors from year 2012-2017 and Exhibit 4.3-1 illustrates where the complaints originated geographically, the vast majority just beyond the one-mile buffer. This visually demonstrates the extent of additional odor complaints that will originate within that area once the buffer is reduced. The SWLTF urges the County to understand the ramifications of this: in addition to the impact on sensitive land uses, additional complaints can result in violations being issued by Placer County Air Pollution Control District (PCAPCD) and other regulatory agencies which could limit or prohibit waste acceptance at the Landfill and/or MRF.

21-3 cont.

Chapter 4.10 Land Use

1. **Impact 4.10-2: Consistency and compatibility with the Western Regional Sanitary Landfill**

The SWLTF is supportive of, and would like to emphasize, the finding under Impact 4.10-2: Consistency and compatibility with the Western Regional Sanitary Landfill, which concluded with a Significant and Unavoidable Impact finding related to consistency and compatibility of proposed land uses, specifically stating that, "Therefore, with implementation of the proposed amendment to the General Plan landfill buffer requirements, the PRSP would bring residential development closer to the WRSL, which would result in an incompatible use with the WRSL." The SWLTF would like to bring attention to this section and advise the County against reducing the landfill buffer which would place family housing, an elementary school, and a middle school or college within the buffer zone. These are incompatible land uses and would cause conflicts with the current landfill operation. The inherent odors from the landfill, MRF, and compost facility, which include handling of food waste, would adversely affect the public's ability to participate in outside activities if these sensitive receptors were allowed to be built in the current landfill buffer zone.

21-4

As noted on page 4.10-15, the EIR acknowledges that the PCAPCD CEQA handbook recommends a screening distance for sanitary landfill odor impacts of one mile from the landfill.

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Still, the Project proposes to modify the existing land use buffer zone standards that apply to solid waste facilities, potentially allowing residential and commercial uses as close as 2,000 or 1,000 feet, respectively (and potentially as close as 1,000 or 300 feet, respectively, when considered on a project specific basis), to the landfill and MRF. The SWLTF advises the County to heed the PCACD recommendation to maintain a one-mile buffer or explain in the EIR the justification for a reduced buffer.

It is important for the County to understand and acknowledge the ramifications of this land use conflict. As mentioned above, the Authority is developing future expansion plans for the Landfill and MRF to address population increases and meet future disposal and recycling needs of the County. The landfill already receives odor complaints outside the one-mile buffer, as described in the Air Quality chapter of the EIR. The SWLTF asks that you consider this as you approve new specific and area plans in proximity to the landfill. Once incompatible development is in place, it will be considerably more difficult for WPWMA to gain the necessary approvals to expand. Despite the current buffer, the facility receives odor complaints and reducing the buffer standards would increase the number of complaints. Even with mitigation, a certain extent of odors is inherent to solid waste operations, so adequate separation from incompatible uses is necessary to protect the long term viability of critical public facilities. As stated in this section, impacts relative to consistency and compatibility of proposed land uses with the WRSL would be Significant and Unavoidable. The SWLTF agrees with this and recommends against the placement of sensitive receptor development projects in the current buffer zone for the landfill.

21-4 cont.

2. **Mitigation Measure 4.10-2: Require odor control measures of specific plans (PRSP Area and Net SAP Area)**

Among other things, the Mitigation Measure proposes the following:

Deed Notification

"Require written disclosures to initial and subsequent prospective buyers, lessees, and renters of those properties, particularly residential buyers, with information that their respective properties would potentially be subject to objectionable odors from a known nearby odor source. While this specific action would not eliminate complaints, it may reduce the frequency of complaints by those living or working closest to the landfill."

21-5

The SWLTF appreciates inclusion of such a mitigation measure, but the language proposed does not preclude a property owner from seeking legal restitution due to odors. The SWLTF recommends that, to the extent legally permissible, the Deed be modified, particularly for parcels within one mile of the landfill, to include language that would prohibit a property owner from litigating against the landfill based on odors.

The SWLTF appreciates all the mitigation measures proposed, but would like to point out that current technologies do not exist to completely eliminate or fully mitigate landfill originated odors. The following WPWMA workshop presentation identifies the odor challenges associated

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with landfill operation even with extensive odor mitigation and monitoring: http://www.wpwma.com/wp-content/uploads/2017/10/2017-Odor-Workshop-Presentation.pdf.

Therefore, the SWLTF supports the EIR conclusion that "this impact would be significant and unavoidable", but is deeply concerned about, and wonders how the County will ensure against, the potential ramifications to the landfill and MRF, as described in the Utilities chapter, should the County approve this Project. In other areas of the state, encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities such as Newby Island in San Jose and Sunshine Canyon in Southern California. These actions have resulted in denials of expansion permits, significant financial ramifications, and abatement orders. The General Plan currently includes a one-mile residential land use buffer around the Landfill. Despite this buffer, the facility receives odor complaints. Reducing the buffer standards would increase the number of complaints. Even with mitigation, a certain extent of odors is inherent to solid waste operations, and therefore, adequate separation from incompatible uses is necessary to protect the long term viability of critical public facilities. The WPWMA facilities are valuable assets in Placer County and can support our community for years to come, if protected. 21-5 cont.

CEQA requires that "When the agency decides to approve a project that will cause one or more significant environmental effects, the lead agency shall prepare a statement of overriding considerations which reflects the ultimate balancing of competing public objectives." The SWLTF urges the County to include in its overriding conditions how it will balance these competing land uses and protect these essential public facilities from potential closure or other impacts.

Chapter 4.15 Utilities

1. **Impact 4.15-11: Potential impact on Western Regional Sanitary Landfill from incompatible land use that results in insufficient permitted capacity to serve waste disposal needs**

This section states, "The close proximity of incompatible land uses and the resulting increased odor complaints that are likely to occur with project implementation could result in increased public pressure and enforcement action. It is possible, but not likely, that such pressure could result in the need for WPWMA to modify WRSL operations, including possible diversion of waste to other facilities. Additionally, complaints related to the landfill and co-located operations could cause opposition to future expansion plans, and could jeopardize approval of the expansion." While the EIR states that these are unlikely scenarios, and ultimately makes a Less than Significant finding, the SWLTF disagrees and feels that these potential impacts are real and significant. 21-6

As mentioned, in other areas of the state, encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities such as Newby Island in San Jose and Sunshine Canyon in Southern California. These actions have resulted in denials of

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expansion permits, significant financial ramifications, and abatement orders. In addition, finding alternative facilities would have a significant cost impact on citizens. If the County is forced to utilize alternative, out of county options for disposal and recycling, it will likely significantly increase ratepayer costs due to hauling waste longer distances and potentially needing additional trucks and routes if separate recycling service is required. In addition, complying with extensive new mandates could be difficult as there is a statewide shortage in organics processing facilities and the facilities and programs would be entirely outside local control. Additional complaints can result in violations being issued by Placer County Air Pollution Control District and other regulatory agencies which could limit or prohibit waste acceptance at the Landfill and/or MRF.

21-6 cont.

We appreciate this opportunity to comment on the Project Draft EIR. We trust that you will consider these comments as you give direction to County staff on the next steps in this important planning process.

Sincerely,

Devin Whittington
Chair, Solid Waste Local Task Force

cc: Crystal Jacobsen, Placer County Planning Services Division

Attachment: Prior Comment Letter dated February 15, 2018

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PLACER COUNTY

SOLID WASTE LOCAL TASK FORCE

Devin Whittington, Chairman

May 3, 2018

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

RE: SUNSET AREA PLAN AND PLACER RANCH SPECIFIC PLAN COMMENTS

The Solid Waste Local Task Force (SWLTF) is an advisory committee which, among other things, reviews and comments on proposed actions, programs, and facilities which affect the management of solid waste and diverted materials in Placer County. Membership of the SWLTF includes representatives from the cities of Roseville, Rocklin, Lincoln, Auburn, and Colfax, Town of Loomis, two franchise waste haulers, landfill and Material Recovery Facility (MRF) operators, the County Board of Supervisors, County Planning Commission, an environmental group, and the general public.
The SWLTF has concerns regarding the proposed Sunset Area Plan and Placer Ranch Specific Plan (SAP/PRSP), which we understand your Board will consider for approval sometime this year. These plans would modify the existing land use buffer zone standards that apply to solid waste facilities, potentially allowing residential and commercial uses as close as 2,000 or 1,000 feet, respectively (and potentially as close as 1,000 or 300 feet, respectively, when considered on a project specific basis), to the Western Regional Sanitary Landfill (Landfill) and MRF. We respectfully submit the following comments and concerns:

Reduced buffer standards could threaten the long-term viability of the Landfill and MRF. As stated in the General Plan, as well as the SAP/PRSP, the buffers are needed to separate potentially incompatible uses and protect the long term viability of critical public facilities. The SWLTF feels that bringing such land uses, particularly residential uses, in close proximity to the Landfill and MRF is incompatible and would not adequately separate those uses from odors and other impacts that could be perceived as nuisances. In other areas of the state, encroaching incompatible development has led to lawsuits and regulatory actions against solid waste facilities such as Newby Island in San Jose and Sunshine Canyon in Southern California. These actions have resulted in denials of expansion permits, significant financial ramifications, and abatement orders. The General Plan currently includes a one-mile residential land use buffer around the Landfill. Despite this buffer, the facility receives odor complaints. Reducing the buffer standards would increase the number of complaints. Even with mitigation, a certain extent of odors is inherent to solid waste operations, so adequate separation from incompatible uses is necessary to protect the long term viability of critical public facilities.

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The Landfill and MRF are crucial public facilities. These facilities are owned and operated by the Western Placer Waste Management Authority (Authority), which is comprised of Placer County and the cities of Lincoln, Rocklin and Roseville. They provide the primary waste disposal and recycling services for the majority of Placer County. The MRF has been key in enabling Placer County jurisdictions to comply with state laws, such as AB 939 which mandates jurisdictions divert 50 percent of their waste from landfills or face fines of up to $10,000 per day. Newer legislation such as SB 1383 which requires an additional 50 percent reduction in disposal of organic waste by 2020 and 75 percent reduction by 2025, and AB 1826 which requires most businesses to separate and recycle organic waste, will necessitate expansion of organic waste processing at the MRF. The Authority is currently in the conceptual planning phase for expansion of the landfill, MRF, and organics processing facilities. Each jurisdiction is required by the State to have fifteen years disposal capacity per AB 939. Having these crucial facilities in the County and under local control is invaluable as solid waste mandates continue to increase.

Finding alternative facilities would have a significant cost impact on citizens. If the County is forced to utilize alternative, out of county options for disposal and recycling, it will likely significantly increase ratepayer costs due to hauling waste longer distances and potentially needing additional trucks and routes if separate recycling service is required. In addition, complying with extensive new mandates could be difficult as there is a statewide shortage in organics processing facilities and the facilities and programs would be entirely outside local control.

Encroaching development could hinder future expansion of Landfill and MRF. Currently, the Authority is developing future expansion plans for the Landfill and MRF to meet future disposal and recycling needs of the County. The SWLTF asks that you consider this as you approve new specific and area plans in proximity to the landfill. Once incompatible development is in place, it will be considerably more difficult for WPWMA to gain the necessary approvals to expand. A potential solution would be to incorporate a coordination agreement into the SAP/PRSP between the County and WPWMA that creates a framework for land uses within and surrounding the WPWMA properties, including WPWMA's expansion plans, as well as mitigation measures to reduce impacts on surrounding development. The WPWMA facilities are valuable assets in Placer County and can support our community for years to come, if protected. Again, appropriate buffer standards and inter-agency coordination can ensure that protection.

We appreciate this opportunity to comment on the SAP/PRSP and ask that you take these comments into account as you consider both the merits and ramifications of this very important project.

Sincerely,

Devin Whittington
Chair, Solid Waste Local Task Force
Solid Waste Utility Manager, City of Roseville

Cc: Crystal Jacobsen, Placer County Planning Services Division

Letter 21	Placer County Solid Waste Local Task Force Devin Whittington, Chair February 13, 2019

21-1 The comment raises issues related to potential effects on the landfill as a crucial public facility, including expansion potential. The comment also raises concerns related to the cost of finding alternative facilities. See Master Response 4: Odors regarding impacts referenced in the comment, as well as the potential for the proposed project to affect future expansion of the WRSL. Also see response to comment 72-6 regarding the likelihood that waste would need to be hauled to an alternative solid waste disposal facility.

21-2 The comment states that using alternative options for disposal and recycling outside of Placer County would significantly increase ratepayer costs. The comment also suggests that complying with new mandates would be difficult. As discussed in Impact 4.15-6 of the Draft EIR, while buildout of the net SAP and PRSP areas would create new sources of solid waste to be disposed at facilities within Placer County, the MRF and WRSL have adequate capacity and the impact was determined to be less-than-significant. Additionally, CEQA requires evaluation of physical environmental effects and does not require the consideration of potential economic effects of a project. Regarding the new mandates, the comment does not identify mandates or a regulating agency. Also see response to comment 10-3.

21-3 The comment notes that the landfill buffer was the subject of previous litigation and that the Placer County General Plan was updated in August 2003 to include the 1-mile buffer. The comment suggests that the EIR explain the decision to support a reduction in the buffer. The proposed changes to General Plan Policy 4.G.11 are presented on page 3-74 of Chapter 3, "Project Description," of the Draft EIR. Impacts related to compatibility with the landfill are evaluated in Impact 4.10-2 of the Draft EIR. As noted in that discussion, the project would result in potentially significant impacts related to compatibility with the landfill, primarily due to odor concerns. While implementation of Mitigation Measure 4.10-2 would potentially aide in increasing land use compatibility, the impact would be significant and unavoidable as mitigation would not eliminate the source of the odor. See Master Response 4: Odors for additional information. Also, as part of its decision whether to certify the EIR and approve the project, Placer County would be required to provide a statement of overriding considerations explaining the reasons it may choose to approve the project despite its significant effects.

21-4 The comment's suggestion that the County should not reduce the landfill buffer is noted and will be considered by decision makers when they decide whether to approve the proposed project.

21-5 The comment provides suggested refinements to the mitigation measures identified in the Draft EIR and raises concerns about potential threats to the operation of the landfill resulting from land use conflicts. See Master Response 4: Odors regarding odor control measures included as part of Mitigation Measure 4.10-2. As part of its decision whether to certify the EIR and approve the project, Placer County would be required to provide a statement of overriding considerations explaining the reasons it may choose to approve the project despite its significant effects. For more discussion on this topic, see response to comment 36-3.

21-6 The comment expresses disagreement with the less-than-significant conclusion of Impact 4.15-11 of the Draft EIR in light of the statement in the analysis that acknowledges the increased odor complaints that are likely to occur. The comment also discusses the potential increase in ratepayer costs and limitations on waste acceptance at the MRF and WRSL. As stated on page 4.15-64 of the Draft EIR, evaluation of potential impacts related to diversion of solid waste to other facilities would be speculative. The analysis in Impact 4.15-11 references the discussion in Impact 4.10-2 related to land use compatibility. Finally, the analysis concludes that based on existing and future operations at the WRSL and research into other similar facilities around California, impacts would be less than significant. Also see Master Response 4: Odors and responses to comments 10-3 and 21-2.

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Placer Group
P.O. Box 7167, Auburn, CA 95604

Letter 22

February 22, 2019

Leigh Chavez, Environmental Coordinator
Placer County Community Development Resources Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn CA 95603
Submitted by e-mail to: cdraecs@placer.ca.gov

Re: 1) "December 2018 Public Review Draft Sunset Area Plan"
2) "December 2018 Public Review Draft Placer Ranch Specific Plan" that is apparently the same thing (but I am not sure) as the "Placer Ranch Specific Plan Development Standards, Design Guidelines Public Review Draft – December 18, 2018"
3) DEIR NOA December 18, 2019, SCH No. 2016112012

Dear Ms. Chavez,

Sierra Club Placer Group thanks Crystal Jacobsen for the excellent February 14, 2019 staff report and presentation about and of the Draft Sunset Area Plan Draft Placer Ranch Specific Plan Draft Environmental Impact Report at the Placer County Planning Commission meeting. These Two Plans update the 1994 Sunset Industrial Area Plan that was an update of the 1980 Sunset General Plan.

As far as we can tell, the area of the plans in question has not been developed as a result of the 1980, 1994, or 2018 plans that have not been implemented during this 38-year period.

Comment period and time per person limited for the DEIR by the Planning Commission Chair[1]

22-1

Sierra Club notes that the December 2018 Draft Sunset Area Plan, the December 2018 Draft Placer Ranch Specific Plan that may be the same as the December 18, 2018 Placer Ranch

[1] The Planning Commission Chair Jeffery Moss who is appointed by Supervisor Kirk Uhler, makes no effort to guide Commission members toward consensus, doesn't display interest in the Commission's planning functions, and regularly leads applicants to believe that requirements don't apply to them that do.

Specific Plan Development Standards/Design Guidelines (the "Two Plans") were not introduced or described at the at the February 14 Planning Commission hearing. Practically speaking, the DEIR and environmental impacts are so voluminous that to focus only on the DEIR at the hearing might seem reasonable.

But there was little semblance of logic at the event. Comments were limited by the Chair to three minutes for individuals and five minutes for organizations, and the demonstrated that his Chair's purpose had nothing to do with having sitting Planning Commission members present for a meaningful hearing, one where they might develop some suggestions and inquiries or question to speakers and conversation amongst themselves that might lead the to shape suggestions for Planning staff preparing responses to commenters.

Because of the uncertainty about when comments were to be, I inquired to Planning about when comments may be made on the Two Plans. **Comments were solicited in the past on the plans, and that comments on the plans as well as the DEIR may be made through the time of the final adoption hearing on the plans, including at the February 14 hearing.**

Instead, at the hearing, the Planning Commission Chair repeatedly directed that comments only could be made about the DEIR. This was stated a couple of times without explanation, arbitrarily, without making sense, suggesting an effort to undermine public participation. The failure to understand the purpose of Planning Commission hearings and the Planning Commission's role, and ignoring the purpose of public hearing and written input to Planning Commissioners, Planning, the other Planning Commissioners, the Board of Supervisors, and other project reviewers and decision making agencies is evident. 22-1 cont.

Commenters out of time were allowed to finish a thought. However, there was no inquiry about how much more time someone might need or if people had covered what they believed was necessary.

Unfortunately comments the public is not allowed to make are not responded to.

Most unfortunate of all, the Chair's directive limits and perhaps eliminates the Commission's engagement with action on, or hearing comments about its powers and duty to protect the public health, safety and welfare.

Hearings are needed on the DEIR where plan comments are entertained, and on Two draft plans. See the attached first notice page and Two Plans cover pages.

<u>This plan should not proceed until a Placer County Municipal Services Review (MSR) is completed for all County unincorporated territory. Existing City and other special districts MSRs should be completed for this and all other pending and proposed unincorporated new County-city and other developments.</u> 22-2

2

The Plans and DEIR and response to the DEIR by the City of Roseville reveal (a) a massive effort by the County to get into the government business of providing all or some municipal services in unincorporated territory, and (b) for this plan, great or potential service impacts and demands on neighboring or nearby Roseville, Rocklin and Lincoln.

Placer County already has the major new unincorporated County-City now being constructed remotely from existing County infrastructure and municipal services, the 14,000 or more unit Placer Vineyards. This area has virtually no county service buildings including human services. Some services will probably come from Sacramento County. However, the County has major bridge building projects over two creeks to serve Placer Vineyards area alone; these are for roads that feed to Sacramento County such as to Watt Avenue. Major Baseline Road improvements are planned for this area and other developments near Baseline.

One new big city serving near County Post Office namely Placer Vineyards, is enough until a county wide MSR is completed.

The Sunset Industrial Park was within the Roseville Sphere of Influence (SOI: the area identified for future growth of cities and districts, but not schools) by the Placer County Local Agency Formation Commission (LAFCO). All or much of the Placer Industrial Area Plan was in Roseville until the County asked Roseville for the Industrial Park to be removed from the Roseville Sphere of Influence. The Roseville Final MSR of May 12, 2010 covered this area.

A LAFCO Resolution removed Sunset Industrial Park from the Roseville SOI and the Reason Farms SOI was added to Roseville.

We are not aware that LAFCO required the County to prepare a MSR for the Sunset Industrial Plan Area before making the SOI change. Whether it did or not, a County Wide all unincorporated territory MSR including review is needed that includes Placer Vineyards, Placer Industrial Plan Area, Riolo Vineyards Specific Plan. This area has Roseville Rail Yard pollutant load and health contours that need assessment), Bickford Ranch, Toad Hill Ranches #1, Martis Valley West Specific Plan, Forest Ranch, and so on.

22-2 cont.

Because there is no alternative to fixed transit and passenger rail in South County north of I-80, we need to plan for this now before moving ahead with the two Plans. Fixed transit and rail passenger systems need be planned and designed first with boulevard and any highway capacity based on it. (E.g., Impacts 4.14-6, 4.14.7, 4.14-9, 4.14-10, 4.14-22, 4.14-23, 4.14-25. Because the Two plan areas seem to be primarily intended to generate employment opportunities, the fixed transit hub absence with significantly higher density around it for all income level housing, is at minimum outdated, not to mention anomalous.

The north end of the traffic mass now and in the future begins and ends at Lincoln (e.g. it does not go north to Wheatland that has about 20,000 vehicles and fewer daily. Most people who have to go one way go the other way north to south east to west. Meta studies show that Highway expansion will only create more traffic while not reliving congestion. Six SR 65 lanes to

22-3

Lincoln will not solve traffic congestion; probably not even eight lanes and the highway corridor could be a fixed transit route. These two plans need to be part of planning for this now. There are a number of alternatives.

The Two Plans area must be considered along with needs of the rest of South County, and not in advance of it. The Sierra Club is opposed to widening SR 65, the $400 million I-80/SR interchange and Placer Parkway. These proposals are antiquated and will be more so with fixed transit and passenger rail development. We have never opposed the current SR 65/I-80 viaduct safety interchange improvements. See the attached Highway capacity Policy Brief and map.

22-3 cont.

Placer County disregarding state law that protects agricultural and forest management lands that are voluntarily put under strict regulation by private landowners. This is a key part of an attack by the County on our farm, ranch and tree farm businesses and families. E.g., Impact 4.1-2.

Williamson Act contracts have been illegally cancelled by the County. At least three or more and perhaps more of the County's 16 Timber Protection Zone properties with houses that pay as little as around $100 annually to the County in taxes based on forest management.

22-4

The two Plans are in the Placer County Conservation Plan area. The PCCP needs to move forward significantly before the Two Plans are implemented.

22-5

Potential conflict of interest and conflict in the use of County funds for this project application for a Placer County project made to itself, which project and DEIR it prepares itself and approves itself, and in addition which expenditures also benefit private landowners in the Two Plans areas and consultants the County has hired for the project who previously did the same or similar work for developers of the area in the past

We assume that the County has addressed and resolved questions about how limiting public input, approving its own projects, resolving conflicts of interest and so on will benefit developers and landowners, is permissible, and is not misuse of public funds. Mechanisms and policies may be in place to prevent conflicts of interest, and prevent use of public funds for private benefit. Having a wall between public organization project proponents and decision makers may be a solution to conflicts of interest.
For solving part of these problems may be based on taxpayer oversight enablement described in California Code of Civil Procedure 526a.

22-6

526a.
(a) An action to obtain a judgment, restraining and preventing any illegal expenditure of, waste of, or injury to, the estate, funds, or other property of a local agency, may be maintained against any officer thereof, or any agent, or other person, acting in its behalf, either by a resident therein, or by a corporation, who is assessed for and is liable to pay, or, within one year

4

before the commencement of the action, has paid, a tax that funds the defendant local agency, including, but not limited to, the following:

(1) An income tax.

(2) A sales and use tax or transaction and use tax initially paid by a consumer to a retailer.

(3) A property tax, including a property tax paid by a tenant or lessee to a landlord or lessor pursuant to the terms of a written lease.

(4) A business license tax.

(b) This section does not affect any right of action in favor of a local agency, or any public officer; provided, that no injunction shall be granted restraining the offering for sale, sale, or issuance of any municipal bonds for public improvements or public utilities.

(c) An action brought pursuant to this section to enjoin a public improvement project shall take special precedence over all civil matters on the calendar of the court except those matters to which equal precedence on the calendar is granted by law.

(d) For purposes of this section, the following definitions apply:

(1) "Local agency" means a city, town, county, or city and county, or a district, public authority, or any other political subdivision in the state.

(2) "Resident" means a person who lives, works, owns property, or attends school in the jurisdiction of the defendant local agency.

22-6 cont.

In addition to the factors above, Sierra Club Vision for South County includes:

- Engaging ecological and physical sciences before any new plan is a proposed, workshopped and adopted, and before each project is located, and designed,
- Maintaining remaining greenbelt areas between Roseville and Lincoln,
- In the city and suburbs, agriculture, community gardens and nature in the city,
- All income housing including moderate and low income housing with that has rare, if any use of in lieu fees,
- Infrastructure, commercial industrial, housing and other entitlements and key factors meet a defined presumption that demand exists for them,
- All residents, property owners and the public at large can sign up to be informed about each government level involvement in the area, and
- That the best source of services, whether County, city of special district, provision of municipal services is evaluated through comparing Municipal Service Reviews for each entity in the area and choosing the best source of them.

22-7

5

- Taxpayers elsewhere in the County do not pay for of subsidize municipal services that they do not benefit from.
- That developers pay up front for improvements, not later after tax payers have footed the bill first.

Conclusion: The place to start instead of this proposal and the hearing last week is with new public workshop review of, (a) the planned to, "A Citizen-Initiated Smart Growth Plan," compared to (b) this resuscitated two Plans relic that is pleased to and planned planned to would be enabled and invited by wasting public highway funds.

$400 million alone on the SR 65/I-80 interchange is proposed in order to, (a) incentivize developers, and (b) attract drivers to the 15-mile Proposed Placer Parkway to Sutter County that would pull drivers through the I-80/SR 64 interchange and up SR 65 to the current Whitney Ranch parkway. Incomplete interchange.

22-7 cont.

Respectfully,

Mike Garabedian
Placer Group Sierra Club
///x 916-719-7296

Letter 22	Placer Group Sierra Club Mike Garabedian February 20, 2019

22-1 The comment expresses concern about the February 14, 2019 public hearing, specifically that it focused on the Draft EIR (and not the specific plan or development standards/design guidelines) and that it limited public comments to three minutes for individuals and five minutes for organizations.

CEQA guidance for public hearings is provided in Section 15202 of the State CEQA Guidelines, which states that formal hearings are not required at any stage of the environmental review process. Nonetheless, public hearings are often part of lead agencies' CEQA environmental review process because they facilitate the purpose and goals of CEQA related to public participation (State CEQA Guidelines Section 15201). Therefore, public hearings are encouraged but not required. With respect to the project, Placer County conducted a public hearing on February 14, 2019 during the public review period to receive comments on the Draft EIR. The hearing was held as part of the Placer County Planning Commission meeting, at 3091 County Center Drive, in Auburn. The meeting began at 10:00 a.m., with the project being the first agenda item at 10:05 a.m. and the public hearing on the Draft EIR concluded just after 1:00 p.m.

Per CEQA, a public agency may include, in its implementing procedures, procedures for the conducting of public hearings (State CEQA Guidelines Section 15202[f]). To that end, Placer County generally follows standard procedures for conducting public hearings for CEQA documents, including the following:

- Members of the public intending to provide public comments during the hearing are asked to sign up on the sign-in sheets provided and are called up to speak in the order they sign up;

- Comments are limited to three minutes for individuals and five minutes for representatives of a group or organization;
- Comments should be focused on the Draft EIR and not on the merits of the project, as that discussion occurs at subsequent hearings on the project;
- Comments are typically recorded to provide a record of the comments, and either a summary of the comments or a written transcript is included in the Final EIR; and
- County staff and/or consultants are available to answer questions from the Commission during the hearing; however, questions from the public are typically noted and a written response is provided later in the Final EIR.

Regardless of whether comments are provided orally or in writing, CEQA requires lead agencies to evaluate comments on environmental issues received from persons who reviewed the Draft EIR and to prepare written responses (State CEQA Guidelines Section 15088[a]). The written response shall describe the disposition of significant environmental issues raised; there must be a good faith, reasoned analysis in response (State CEQA Guidelines Section 15088[c]). This Final EIR contains written responses to significant environmental issues raised in comments on the Draft EIR (both those provided in writing and those provided at the February 14, 2019 public hearing).

22-2 The comment seeks a municipal services review for all other pending and proposed unincorporated new County-City and other developments. A municipal services review is not required for the SAP (including the PRSP). The PRSP area is not included within any sphere of influence by an adjacent jurisdiction. Only a small portion of the net SAP area is located within the City of Lincoln's sphere of influence and Lincoln has an adopted General Plan which outlines its projected growth patterns.

22-3 The comment expresses concern that fixed transit systems should be planned for the proposed project area. The Draft EIR and the project acknowledge that a planned BRT route would provide service through the PRSP area and western Placer County. The exact route for this BRT service is still to be determined and may be considered as part of the Long-Range Transit Master Plan effort referred to in Policy TM-3.1, or the SAP/PRSP transit master plan identified in Mitigation Measure 4.14-13a. This fixed route BRT service is expected to connect the PRSP and SAP areas to regional employment centers and transit hubs, including light-rail facilities in Sacramento County. Even with this BRT service, additional highway capacity would be necessary to serve forecasted traffic volumes, as described in the traffic analysis contained in the Draft EIR.

The comment also expresses opposition to major capacity enhancing highway projects, such as widening SR 65, the I-80/SR 65 interchange, and Placer Parkway. As described on page 4.14-94 of the Draft EIR, it remains reasonably foreseeable to include these projects in the cumulative traffic analysis because they are included in the financially constrained project list of the SACOG 2036 MTP/SCS. Therefore, it has no bearing on the Draft EIR traffic analysis inputs or findings.

22-4 The comment expresses concern about Williamson Act contracts. This issue is addressed in the Draft EIR in Section 4.2, "Agricultural Resources," under Impact 4.2-2 on page 4.2-15. As described therein, implementation of the project would not require cancellation of any Williamson Act contracts. The 716 acres currently under contract within the SAP area would not be impacted and would be maintained under the terms of each contract. The 716 acres includes properties located within land designated Preserve/Mitigation Reserve, which allows for agricultural uses and does not allow for development.

22-5 The comment states that the PCCP should move forward before the project is implemented. See Master Response 3: Placer County Conservation Program and Mitigation. The PCCP is expected to go before the County Board of Supervisors for decision at the end of 2019, or early 2020. However, as

described in the master response, the mitigation measures identified in the Draft EIR are not dependent on approval of the PCCP.

22-6 The comment indicates that there is a potential conflict of interest because the County used public funds for a County project. This comment does not raise issues related to environmental impacts or any issues regarding the adequacy of the Draft EIR. No further response is necessary.

22-7 The comment describes Sierra Club's vision for south Placer County, and requests a new public workshop be conducted to review the Citizen-Initiated Smart Growth Alternative. Going forward, several meetings will be held as part of the project approval process, and the public is invited to attend and provide comments at these meetings, which will include the Placer County Planning Commission and the Placer County Board of Supervisors.

Regarding the suggestion that the County begin workshops for the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

Regarding the comment about the transportation funds, it is unclear what the comment is suggesting, but it does not appear to raise issues related to environmental impacts or issues related to the adequacy of the Draft EIR. Therefore, no further response is necessary.

From: Placer Women Democrats <pwdcommunication@gmail.com>
Sent: Wednesday, February 20, 2019 6:49 PM
To: Shirlee Herrington
Subject: Sunset Project

Letter 23

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan. revealed significant impacts to the environment that cannot be mitigated. Because of the Projects egregious environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative.

If the Board determines to pursue the project, the Draft EIR must be recirculated because it fails to adequately analyze environmental impacts and is incomplete.

I respectfully request that as you recirculate the DEIR, that the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed as a Project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives as set forth in the DEIR.

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Melissa Harty-Swaleh

23-1

Letter 23	Placer Women Democrats Melissa Harty-Swaleh February 19, 2019

23-1 The comment is primarily directed toward the project approval process and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

The comment requests that the Draft EIR be recirculated but does not provide specific reasons why the Draft EIR impact analysis is inadequate or incomplete. Therefore, a response is not warranted. Nonetheless, see Master Response 8: Recirculation for additional discussion on this topic.

The comment also suggests that the County evaluate the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

RD1000

Letter 24

February 19, 2019

Ms. Crystal Jacobson, Project Manager
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95603

Subject: Comments Draft Environmental Impact Report (EIR) for the Sunset Area Plan/ Placer Ranch Specific Plan Project

Dear Ms. Jacobson:

Reclamation District No. 1000 (RD 1000; District) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan/Placer Ranch Specific Plan Project (Project). As noted in the District's prior response to the Notice of Preparation (NOP) for this DEIR on February 27, 2018, RD 1000 is the entity responsible for the operation and maintenance of the levees and drainage system protecting the Natomas Basin in Sacramento and Sutter counties. Minimizing the impacts of flooding for human safety, health, and welfare is RD 1000's sole mission. As such, the District has been working closely with the Sacramento Area Flood Control Agency (SAFCA), State Central Valley Flood Protection Board and U.S. Army Corps of Engineers (USACE) on levee improvements to provide a minimum of 200-year flood protection to the system commensurate with the flood risk, as required by State Urban Level of Flood Protection standards. Along with the levee improvements, RD 1000 has been working with SAFCA, Sutter County and Reclamation District 1001 to address impacts of upstream development in the Natomas Cross Canal watershed, which consequently includes the proposed Project.

Due to the nature of the Project and RD 1000's mission to minimize impacts of flooding, the District requests the Final EIR specifically address the following comments:

DEIR Section 4.9 – Hydraulic Impact Analysis.

- The hydraulic impact analysis evaluates changes to peak stage for the 10 – 100 year flood events. The analysis does not include evaluation of the 200-year flood event, as required by the State's Urban Level of Flood Protection (ULOP), because as stated in the report, the watershed is less than 10 square miles and therefore statutorily exempt. The District

24-1

RECLAMATION DISTRICT 1000
1633 Garden Highway • Sacramento, CA 95833 • (916) 922-1449

acknowledges that while it may be accurate to say the Project is exempt from ULOP, the document does not adequately address impacts to the downstream levee systems, which are subject to the ULOP. The District requests the hydraulic impact analysis be revised to include evaluation of impacts for the 200-year flood event. 24-1 cont.

- The evaluation of hydraulic impacts focuses solely on mitigating increases in peak flood stage. However, downstream interests are also concerned with changes in the duration of flooding and changes in velocity that have the potential to increase erosion. This is particularly true for downstream levee systems that have a short hydrograph. Extending the duration of high water on these levee systems may result in increased performance issues associated with seepage both through and under the levees. The District requests that future EIR's disclose the change in duration of flood events and determine whether that change adversely effects downstream levee systems. Mitigation measures could be considered that include alternatives such as groundwater recharge, metering the water more slowly out of the detention basin, or storage of the water for use. 24-2

- RD 1000 is concerned the potential impacts of increased storm water drainage flows into upstream tributaries for past projects; potential future projects; and specifically, for this Project, may increase flood risks downstream. Mitigating increased runoff is crucial in order to avoid downstream impacts to critical flood infrastructure. The detention/retention mitigation measures stated in the DEIR may not be considering all potential hydrologic impacts; specifically, increases to peak and base flows, the duration of runoff, duration of peak flows, and the subsequent increased periods of high velocities. 24-3

- Hydrographs for smaller systems tend to have shorter hydrographs. Past performance is based on this tendency and is considered in the design of downstream levee improvements. If detention is the alternative used to mitigate increases in peak flow, it can result in the adverse impact of extending the duration of the hydrograph. This has the potential to increase geotechnical problems, such as slope stability and under seepage, and can contribute to an increase of erosion potential, all of which would increase flood risk and create increased Operations and Maintenance (O&M) costs for downstream critical flood infrastructure. In addition, to peak flows and duration, upstream development typically results in higher base flows due to runoff from landscaping, wastewater treatment discharge, or other discharges associated with urbanization. Increasing base flows may also result in increased vegetation growth, erosion, and beaver activity; thus, causing an increase in downstream O&M costs. 24-4

Any of the impacts discussed in this letter could have detrimental downstream effects that not only could increase flood risk to public safety but could also result in increased O&M costs for RD 1000 that may be required in order to mitigate potential Project impacts. Flood risk may include erosion, increased vegetation, or potential impacts to channel maintenance or downstream flood infrastructure due to an increased duration of peak runoff and peak flows. 24-5

Therefore, RD 1000 believes additional hydraulic analysis is critical to deciding the Project poses no significant hydraulic impacts, as part of its Environmental Impact Report (EIR). This Project should also consider any planned future development within the area that may contribute to cumulative downstream effects on both stage and duration of peak flows. Until these impacts are considered, any EIR submitted without proper analysis would not be complete and could not be certified. 24-5 cont.

The District appreciates the opportunity to review and comment on the DEIR for the proposed Project. The District is prepared to work with the County and the Project applicant along with the District's flood control partners in the Natomas Cross Canal watershed. Should there be further questions or the need for additional clarification on the information provided, please contact me directly via email (kking@rd1000.org) or phone (916) 922-1449.

Sincerely,

Reclamation District 1000



Kevin L. King
General Manager

Cc: *Delivered via electronic mail only*

Gary Bardini (SAFCA)
Doug Libby (Sutter County)
Guadalupe Rivera (Sutter County)
Joe Henderson (RD 1001)
Ric Reinhardt (MBK Engineers)

Letter 24	Reclamation District 1000 Kevin L. King, General Manager February 22, 2019

24-1 The comment requests 200-year flood event modeling. The 200-year event is not a required event for evaluating hydraulic impacts for this project because of the State's Urban Level of Flood Protection (ULOP) criteria, which statutorily exempts the project because the tributary watershed is less than 10 square miles. However, the PRSP Storm Drainage Master Plan in Appendix I of the Draft EIR does include a project level analysis of the 200-year event peak flows. (Note that a more recent version of the PRSP Storm Drainage Master Plan that includes minor revisions is provided as Appendix E of this Final EIR.) This analysis shows that post-project 200-year peak flows would be reduced to below 80 percent of pre-project peak flows at Compliance Points 1 and 3. Projects within Placer County are required to mitigate for the effects of development. Storage facilities that provide mitigation are designed for storm events up to and including the 100-year storm as required per Section VII.C.2 of the Placer County Stormwater Management Manual. Development within the net

SAP area is analyzed at a programmatic level for this EIR. The SAP Storm Drainage Technical Report (Appendix C of the Draft EIR) states that detailed level analyses and mitigation measures would be provided at future development stages. The 200-year event would be analyzed for applicability under ULOP and detailed as needed for individual projects proposed within the SAP. The volumetric retention studies in Draft EIR Appendix D evaluate the proposed volumetric mitigation alternatives including that for the Pleasant Grove Retention Facility. These facilities (if selected and implemented) would provide volumetric mitigation of stormwater during large storm events. The preliminary design analysis for these facilities have utilized an 8-day, 100-year design storm event to calculate needed mitigation volumes. This storm event is based on the precipitation produced by the February 1986 historical flood. The final project level analysis for the Pleasant Grove Retention Facility, assuming that is the chosen mitigation alternative, is expected to analyze a variety of storm event intervals including the 200-year event within the project area. However, it should be noted that the 100-year, 8-day design event as analyzed utilizes a storm depth of 10.75-inches at an elevation of 200-feet. This large storm event would include several shorter duration 200-year events. For comparison, the 200-year, 1-day storm depth at an elevation of 200-feet is 4.82-inches and the 200-year, 5-day storm depth is 9.86-inches. Therefore, downstream impacts for the 200-year event are expected to be consistent with the conclusion identified in Draft EIR Impact 4.9-1, considering that mitigation and preliminary retention facility design uses this historical design flood event. No revisions to the Draft EIR are necessary.

24-2 The comment requests future EIRs disclose the change in duration of flood events and determine whether that change adversely affects downstream levee systems. Changes to the duration of flooding for the 100-year, 8-day design storm event would be mitigated by the Regional Volumetric Facility (i.e., Pleasant Grove Retention Facility), which would be able to hold the increases in runoff volumes, such that increases in "Volume-Duration" issues should not occur for that event. The detention basin designs for peak flow mitigation would also accomplish mitigation of some volume-duration issues as discussed in those projects' specific drainage analysis, as required by Mitigation Measures 4.9-1a and 4.9-1b. The analysis and conclusion identified in Impact 4.9-1 are adequate; no revisions to the Draft EIR are necessary.

24-3 The comment expresses concern regarding base flows. The County has developed standards for meeting the requirements of the Phase II MS4 permit, contained within the West Placer Storm Water Quality Design Manual. An element of this permit is to design LID and water quality facilities to capture increased runoff for storm events up to the 85th percentile storm event. This would minimize base-flow impact concerns from the development areas. No revisions to the Draft EIR are necessary.

24-4 The comment repeats similar comments as noted above. See responses to comments 24-2, 24-3, and 24-5.

24-5 The comment summarizes similar volume-discharge concerns as identified in comments 24-2, 24-3, and 24-4. The projects that develop in the PRSP and SAP areas would be required to provide the mitigation measures described in comments 24-2 and 24-3 above. These projects would be required to mitigate peak flow and volumetric impacts per the Placer County Stormwater Management Manual design standards. The volumetric mitigation methodologies currently outlined in the PRSP and SAP are based on the 100-year, 8-day design storm event criteria developed for use in the Natomas Cross Canal Watershed by the City of Roseville, City of Lincoln, and Placer County. The proposed measures would minimize the potential for increases in peak flow and volume of runoff. The analysis and conclusion identified in Impact 4.9-1 are adequate; no revisions to the Draft EIR are necessary.

From: Susan Calhoun <scalhoun@rcsdk8.org>
Sent: Wednesday, January 23, 2019 10:15 AM
To: Placer County Environmental Coordination Services
Cc: Dennis Snelling; Justin Barrett
Subject: Re: Sunset Area Plan/Placer Ranch Specific Plan (State Clearinghouse No. 2016112012)

Letter 25

Good Morning Shirlee!

Thank you so much for adding me to your distribution list!

I have been updated from our Assistant Superintendent of Business Services, Dennis Snelling, regarding my initial response. We will need to enter into full mitigation agreements at about $27,000 per home in today's dollars in order to build schools for the future students. Please disregard my previous email. **25-1**

Thank you and have a great day!

Susan Calhoun
Maintenance and Facilities
Roseville City School District
(916) 782-5289 x 50203

On Wed, Jan 23, 2019 at 9:57 AM Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov> wrote:

> Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. Also, you are on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities to for participation and input.
>
> Thanks.
>
> Shirlee Herrington
> Community Development Technician Environmental Coordination Services
> Placer County Community Development Resource Agency 3091 County Center Drive, Suite 190, Auburn, CA 95603 530-745-3132 fax 530-745-3080

From: Susan Calhoun [mailto:scalhoun@rcsdk8.org]
Sent: Tuesday, January 22, 2019 12:47 PM
To: Placer County Environmental Coordination Services
Cc: Justin Barrett; Dennis Snelling
Subject: Sunset Area Plan/Placer Ranch Specific Plan (State Clearinghouse No. 2016112012)

Thank you for the opportunity to respond to the proposed project referenced above. Additional funding is necessary to adequately accommodate the future K-8 grade students in the Roseville City School District.

Collection of developer fees pursuant to Government Code Section 53080 and 065995 on the above referenced project, located on 8,497 acres in South Placer County, will be as follows, subject to change based upon fees in effect at the time of payment: **25-2**

Residential: $2.29 per square foot
Commercial: $0.37 per square foot
Active Adult: $0.03 per square foot

Please contact me if you have any further questions.

Have a great day!

Susan Calhoun
Maintenance and Facilities
Roseville City School District
(916) 782-5289 x 50203

1

Letter 25	Roseville City School District Susan Calhoun, Maintenance and Facilities January 23, 2019

25-1 The comment from the Roseville City School District (RCSD) states that the District would need to enter into full mitigation agreements at approximately $27,000 per residential unit to build schools for future students. As discussed in Impact 4.13-3 of the Draft EIR, payment of school fees would be considered full mitigation for impacts on school capacity. The comment provides an approximate amount of fees per residential unit that would be needed. Agreements between RCSD and project developers regarding building fees are beyond the scope of the EIR as CEQA requires an EIR to focus on potential impacts of a project on the physical environment. As discussed in Impact 4.13-3, physical effects on the environment associated with the construction and operation of new school facilities in the project area are evaluated in the resource sections of the Draft EIR.

25-2 The comment cites to sections of the Government Code regarding developer fees and notes that projected fees would be subject to change based on fees in effect at the time of payment. See response to comment 25-1.

From: Landon, Joseph <jlandon@rjuhsd.us>
Sent: Friday, February 22, 2019 10:54 AM
To: Placer County Environmental Coordination Services
Subject: Comments for Sunset Area Plan & Placer Ranch Specific Plan

Letter 26

Hi,
I have the comment below to submit in regards to the Sunset Area Plan & Placer Ranch Specific Plan:

The proposed project will generate a large number of students severely impacting the Roseville Joint Union High School District's ability to house these additional pupils. Current State and local funding avenues available to the District are woefully inadequate to cover the costs of housing these additional students creating a serious hardship on the District. To address this, the District desires to enter into a Mutual Benefit Agreement with the developer to ensure adequate funding is available to pay for school facility needs created by this project. The district supports the plan if the developer and the district are able to come up with an agreement to the satisfaction of both parties. 26-1

Thank you,

Joe Landon, CPA

Assistant Superintendent, Business Services
Roseville Joint Union High School District
jlandon@rjuhsd.us
(916)782-6565 ext.1021

From: Crystal Jacobsen <CJacobse@placer.ca.gov>
Sent: Tuesday, February 19, 2019 7:46 AM
To: Landon, Joseph <jlandon@rjuhsd.us>
Cc: Davis, Scott <scdavis@rjuhsd.us>; 'Mike Tucker' <tucker@girardedwards.com>; Shirlee Herrington <SHerring@placer.ca.gov>
Subject: RE: Comments for Sunset Area Plan & Placer Ranch Specific Plan

Hi Joseph,

Written comments can be submitted in the form of an email or a letter and should be submitted no later than 5pm on Friday, February 22, 2019. Here's the specifics about where to send comments:

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
Or fax (530)745-3080
Or email cdraecs@placer.ca.gov

Let me know if you have any further questions.

Best,
Crystal

Crystal Jacobsen | Principal Planner, Advanced Planning
Placer County Community Development Resource Agency
Planning Services Division
3091 County Center Drive Ste. 140, Auburn, CA 95603
530.745.3000 (main) | 530.745.3085 (direct) | 530.745.3080 (fax)| cjacobse@placer.ca.gov

Letter 26	Roseville Joint Union High School District Joe Landon, CPA, Assistant Superintendent February 22, 2019

26-1 The comment states that current state and local funding avenues available to the Roseville Joint Union High School District (RJUHSD) are inadequate to cover the costs of additional students and that the RJUHSD would like to enter into a mutual benefit agreement with the project developer to ensure adequate funding. See response to comment 25-1.

Letter 27

Re: Exhibits 4.91 and 4.9.2

First of all, Auburn is NOT and intermittent stream, not an ephemeral stream. It is a year-round stream with its our year-round natural flow as CDFW and NOAA both determined. In an attached letter date March 10, 2015, garnered by SARSAS through Freedom of Information Act, one of the three violations listed by California Department of Fish Wildlife's CDFW) Regional Manager Tina Bartlett against Nevada Irrigation District is F and G Code Section 1602 – "diverts the natural stream flow of Auburn Ravine Creek into Hemphill Canal". Auburn Ravine obviously has a natural flow and is NOT "an intermittent stream". 27-1

Too, Water Agencies have somehow started using Auburn Ravine, a natural waterway, for water deliveries to its customers which seems a violation of a natural waterway; is there authorization for agencies to so use these ravines? 27-2

Secondly, our concern is that SAP will create such runoff by the paving over of natural lands that the runoff which flows into Orchard Creek will definitely be polluted and Orchard Creek is a main tributary of Auburn Ravine. 27-3

Thirdly, both streams of Auburn Ravine Watershed, Racoon and Auburn Ravine, after the effluent from Orchard Creek enters Auburn Ravine, are joined at the Eastside Canal, which flows into the Eastside Canal, and then water are then mixed with those of Pleasant Valley Creek. All of these waters then flow into the Sacramento River at the fishing hamlet of Verona. Any contamination that enters any of these three creeks also negatively impacts the Sacramento River. 27-4

Pleasant Valley Creek is also erroneously listed as an intermittent creek. We just installed dual cone screens at the junction of Auburn Ravine and Pleasant Grove Canal, which diverts water from Auburn Ravine into Pleasant Grove Creek. Since Auburn Ravine is a year-round stream and its water flow into Pleasant Grove Creek, it follows the Pleasant Grove Creek in not an intermittent stream either. 27-5

These kinds of inaccuracy must be corrected and the reality addressed before any continuance of the SAP takes place.

Every effort possible should be taken to prevent this SAP contamination into our local creeks and the Sacramento River from taking place.

Jack L. Sanchez
SARSAS President and Founder

State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
916-358-2900
www.wildlife.ca.gov

EDMUND G. BROWN, Jr. Governor
Charlton H. Bonham, Director

#1 RON NELSON FROM TINA BARTLETT

BY OVERNIGHT MAIL AND EMAIL

MAR 10 2015
Date

#2 Remleh Scherzinger, General Manager
Nevada Irrigation District
1036 West Main Street
Grass Valley, CA 95945
scherzinger@nidwater.com

Subject: Suspension of Notification of Lake or Streambed Alteration (Notification No. 1600-2014-0270-R2).

Dear Mr. Scherzinger:

On November 3, 2014, the Department of Fish and Wildlife received the Nevada Irrigation District's (NID) above-referenced notification (notification) to conduct maintenance activities on NID's existing Hemphill Dam (dam). As Department staff informed you on March 2, 2015, the Department is suspending processing of the notification pursuant to Fish and Game Code section 1613 for the reasons discussed during a site visit with you on February 10, 2015, and below.

Under Fish and Game Code section 1613, the Department may suspend processing a notification if it determines "the activity described in the notification, or any activity or conduct by the entity directly related thereto, violates any provision of the [Fish and Game Code]." Section 1613 applies in this case for two reasons: 1) the dam violates * Fish and Game Code section 5901 because it "prevents, impedes, or tends to prevent or impede the passing of fish up and downstream"; 2) the dam substantially diverts the * natural flow of Auburn Ravine Creek into Hemphill Canal, but NID has yet to notify the Department under Fish and Game Code section 1602 for this diversion. The Department understands the primary objective of the project described in the notification is to enhance the passage of anadromous fish at the dam. However, even with the project, the dam will still impede or tend to impede the passing of fish up and downstream. (5937) trust?

NID will need to address the problems described above before the Department will continue processing the notification. In the meantime, NID may not proceed with the project described in the notification.

If you have any questions regarding this matter, or would like to meet with the Department in an effort to resolve the issues described herein, please contact Patrick

Conserving California's Wildlife Since 1870

EDMUND G. BROWN Jr. Governor

Moeszinger, Environmental Scientist, at (916) 358-2850 or by email at patrick.moeszinger@wildlife.ca.gov. Thank you for your anticipated cooperation.

Sincerely,

Tina Bartlett

Tina Bartlett
Regional Manager

ec: Patrick Moeszinger
patrick.moeszinger@wildlife.ca.gov

Jennifer Nguyen
jennifer.nguyen@wildlife.ca.gov

Wildlife Officer, Erica Manes
erica.manes@wildlife.ca.gov

Lauren Mulloy
lauren.mulloy@wildlife.ca.gov

MaryLisa Lynch
marylisa.lynch@wildlife.ca.gov

Lieutenant, John Lawson
john.lawson@wildlife.ca.gov

Captain, Mark Jeter
mark.jeter@wildlife.ca.gov

Mike Healey
mike.healy@wildlife.ca.gov

Colin Purdy
colin.purdy@wildlife.ca.gov

Letter 27	SARSAS [Save Auburn Ravine Salmon and Steelhead] Jack L. Sanchez, President and Founder No date

27-1 The comment states that Auburn Ravine is a perennial stream. In the Environmental Setting of Section 4.9, "Hydrology and Water Quality," on page 4.9-1, the Draft EIR explains that while Auburn Ravine functions as an intermittent stream under natural conditions, its hydrology has been altered by year-round discharges from wastewater treatment, power generation, and irrigation. These discharges now maintain year-round flow in the ravine.

27-2 The comment asks about oversight for discharges to natural waterways. Discharges to waters of the United States (including intermittent streams and some wetlands) are regulated through the Clean Water Act. Additionally, California regulates discharges to waters of the state through the Porter-Cologne Water Quality Control Act. See Section 4.9.3, "Regulatory Setting," of the Draft EIR for additional discussion of this topic. Further, it is important to note that the County does not have regulatory authority over water purveyors.

27-3 The comment expresses concern regarding the water quality effects of development associated with the SAP. The Draft EIR addresses potential water quality effects in Impact 4.9-3: Construction related water quality impacts, and Impact 4.9-4: Water quality impacts from urban land uses.

27-4 The comment expresses similar concerns to comment 27-3 related to water quality. See response to comment 27-3, above.

27-5 The comment states that Pleasant Grove Creek is a perennial stream. As discussed in Section 4.9.2 of the Draft EIR, Pleasant Grove Creek and its tributary channels were historically intermittent streams that dried in summer; however, many of the channels now have perennial flows from urban runoff, agricultural irrigation return flows, and contributions from the Pleasant Grove Wastewater Treatment Plant.

Letter 28

Sierra Nevada Group

Mother Lode Chapter

P.O. Box 1042 Nevada City, California 95959

February 20, 2019

Shirlee Herrington
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 96503
cdraecs@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report

Dear Ms. Herrington:

I write on behalf of the Sierra Nevada Group of the Sierra Club. Though we reside in Nevada County we are concerned about many aspects of the Sunset Area Plan and Placer Ranch Specific Plan DEIR. We do absorb the GHGs, the ozone, the ever-increasing traffic in the region, the loss of open space, vernal pools, wetlands – all significant impacts associated with this very large project.

A primary concern regarding the SAP/PRSP DEIR is its disturbing lack of strategic planning for the future in the face of our rapidly changing climate and its indisputable cause – Green House Gas emissions. The Plan continues with a business-as-usual model of automobile dependency throughout the area with a projected 870,000 daily vehicular trips spewing 575,000 metric tons per year of Green House Gases and virtually no viable public transit. Does the County really expect that this type of planning can be accepted? Granted that an earlier plan (1997) was being used and reworked, but surely someone must have called your attention to its shortcomings even then. We can't keep repeating the mistakes of the past – we must design for the future.

What happened to Smart Growth? Our world is changing in many unexpected ways and Placer County leaders must recognize that continuing to use the model of low density, automobile-dependent housing with the hope that it will match the jobs portion of the SAP is not what is needed to combat the threat we are facing. In fact the industrial/commercial jobs portion of the Plan is in excess of the housing portion creating an imbalance and the specter of more vehicular trips – more GHGs.

28-1

Sierra Nevada Group of the Sierra Club comment letter Page 2

A serious flaw is the lack of public transit or futuristic thinking about it. Much of the circulation is dependent on a parkway that isn't built yet and may be subject to delays and changes. Perhaps if there were a re-design, reorganizing the placement of housing, schools and jobs, some innovation could be brought forward, such as rail (there is a nearby track in place) or transit hubs that could accommodate bus transit. 28-2

The need for mitigation for so many significant and unavoidable impacts in the current Plan could make it unaffordable for the County and its backers to move forward. Couldn't some of that mitigation money be better used to provide low-income housing and the types of transit that would reduce the climate-changing Green House Gas emissions? And help finance building improvements to make all the new buildings (housing, commercial and industrial) zero net energy – which will be a California requirement in 2020. 28-3

Regardless of how it is paid for, the goal of the Project overall should be to reduce energy needs for homes and businesses and that developers and builders are required to meet those standards and overall goals. Reducing the Project's footprint would go a long way toward lowering its mitigation costs and impacts to the region.

As discussed above, the PRSP/SAP DEIR revealed significant impacts to the environment that cannot be sufficiently mitigated. Because of the Project's numerous and dangerous environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative. Failing that, then the Draft should be recirculated to more completely analyze the impacts. In the recirculation, we ask that an Alternative entitled Citizen-Initiated Smart Growth Plan developed by Alliance for Environmental Leadership (AEL) also be analyzed as an environmentally superior Alternative which actually meets the County's objectives specified in the DEIR. 28-4

I believe we as citizens of today have an obligation to citizens of tomorrow to not continue to destroy the world in which they will have to live and work.

Thank you for the opportunity to provide comments.

Sincerely,

Barbara L. Rivenes

Barbara Rivenes, Chair
Sierra Nevada Group/Sierra Club
108 Bridger Ct.
Grass Valley, CA 95945

Letter 28	Sierra Club, Sierra Nevada Group Barbara Rivenes, Chair February 20, 2019

28-1 The comment expresses concern about the project's significant impacts related to GHGs, ozone, traffic, open space, vernal pools, and wetlands. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. Therefore, no further response is warranted.

28-2 The comment expresses concern regarding the lack of planned public transit service. The Draft EIR and the SAP and PRSP acknowledge that a planned BRT route would provide service through the PRSP area and western Placer County. The exact route for this BRT service is still to be determined and may be considered as part of the Long-Range Transit Master Plan effort referred to in Policy TM-3.1 and/or the SAP/PRSP transit master plan identified in Mitigation Measure 4.14-13a of the Draft EIR. This fixed route BRT service is expected to connect the PRSP and SAP areas to regional employment centers and transit hubs, including light-rail facilities in Sacramento County.

28-3 The comment states that the need for mitigation could make it unaffordable to move forward with the project. Financial issues such as these are not a physical environmental effect under CEQA and are not required to be analyzed in an EIR or other CEQA analysis. The Placer County Planning Commission and Board of Supervisors will weigh the environmental impacts and benefits of the project when making decisions regarding the project.

28-4 The comment states that the goal of the project should be to reduce energy needs for homes and businesses and that developers and builders should be required to meet those standards and overall goals. Section 3.4, "Goals and Objectives," of the Draft EIR lists the objectives for both the SAP and PRSP. Specifically, the PRSP contains goals to foster sustainable community design and enable Blueprint consistency (see Draft EIR page 3-8), which both speak to energy efficiency. Energy efficiency is also addressed in the Draft EIR in Section 4.16, "Energy." The County's General Plan, with which the project must comply, includes energy efficiency goals that are listed in the Draft EIR on page 4.16-7. Likewise, the SAP includes goals and policies related to energy consumption, which are listed on pages 4.16-9 through 4.16-14 of the Draft EIR.

The comment also states that because of the project's significant and unavoidable impacts, the County should approve the No-Project Alternative. This comment is directed toward the project approval process and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

The comment requests that the Draft EIR be recirculated but does not provide specific reasons why the Draft EIR impact analysis is inadequate or incomplete. Therefore, a response is not warranted. Nonetheless, see Master Response 8: Recirculation for additional discussion on this topic.

The comment also suggests that the County evaluate the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

Letter 29

SIERRA FOOTHILLS AUDUBON SOCIETY
P.O. BOX 1937
GRASS VALLEY CA 95945-1937

RECEIVED
FEB 15 2019
CDRA

February 10, 2019

Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012)

Dear Ms. Herrington:

On behalf of the Sierra Foothills Audubon Society (SFAS), I am submitting our comments on the Sunset Industrial Area and Placer Ranch in Placer County DEIR. SFAS is an organization whose main geographical area of work is Placer and Nevada counties. We have the following concerns that we respectfully request be addressed by the County.

The DEIR Section 2.7 "Summary of Environmental Impacts and Recommended Mitigation Measures" lists mitigation measures (fixes) for all impacts. This letter concerns the impacts and mitigations relating to greenhouse gas emissions.

Impact 4.7-2: Operational greenhouse gas emissions

"Operation of the land uses developed under the net SAP area is estimated to generate 378,518 MTCO2e/year at full buildout, and operation of the land uses developed under the PRSP area is estimated to generate 201,004 MTCO2e/year at full buildout. These levels of GHG emissions have the potential to result in a considerable contribution to cumulative emissions related to global climate change and conflict with state GHG reduction targets. **This impact would be significant."**

Various mitigations are proposed as noted below, but 4.7.2 still is considered **significant and unavoidable**.

Mitigation Measure 4.7-2a: Implement all feasible on-site features to reduce operational GHG emissions (Net SAP Area and PRSP Area)

Building Energy

Reduce GHG emissions associated with building energy through the following measures:

Sierra Foothills Audubon Society's mission is to work within our community to promote appreciation of and protection for birds and their habitats.

- *Single family residential buildings constructed within the net SAP area and the PRSP area shall be designed to achieve a 30 percent reduction in energy use versus a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 2 of the 2016 California Green Building Standards Code, Section A4.203.1.2.2. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential energy modeling software.*
- *Multi-family residential buildings of three stories or less constructed within the net SAP area and the PRSP area shall be designed to achieve a 15 percent reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 1 of the 2016 California Green Building Standards Code, Action A4.203.1.2.1. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential modeling software.*
- *Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.*
- *All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2.*

The DEIR states: *"Under Appendix G of the State CEQA Guidelines, a project would result in a cumulatively considerable contribution to climate change if it would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Placer County is the CEQA lead agency for the project and is, therefore, responsible for determining whether an impact would be considered significant. At the time of writing this Draft EIR, Placer County does not have an adopted Climate Action Plan consistent with State CEQA Guidelines Section 15185.5(b)".*

The DEIR also states: *"The Placer County General Plan includes the following policies related to addressing GHG emissions and climate change in Placer County:*
Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency, and encourage developers to exceed Title 24 requirements. Retrofitting of existing units shall be encouraged.
Policy G-3: The County shall continue to implement provisions of the Subdivision Map Act that require subdivisions to be oriented for solar access, to the extent practical."

Our comments

California's 2019 Building Energy Efficiency Standards officially take effect on January 1, 2020. Single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once rooftop solar

29-1

electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. This will reduce greenhouse gas emissions by 700,000 metric tons over three years, equivalent to taking 115,000 fossil fuel cars off the road.

We ask that even if building permits are granted this year, given the climate emergency and the California renewable goals, that these projects be required to meet the 2020 Title 24 Chapter 6 Building Rules of zero net energy for all single residence homes in the project area. We also suggest that non-residential buildings be required meet the 2030 standard of zero net energy, without height limitations. Cool roof should be required in connection with solar panels. 29-1 cont.

Implementing these suggestions will help reduce the operational GHG emissions (Net SAP Area and PRSP Area) and change the determination from unavoidable to avoidable. The revised County EIR must show the projected greenhouse gas emissions after the required changes are made.

Other policies referred to in the DEIR

The Proposed Sunset Area Plan goals include:

a) *Policy NR-6.2: Energy Efficient Construction. The County shall encourage new construction to achieve third-party green building certification, such as the GreenPoint Rated program and the LEED rating system. This will include building and capital improvement design practices that reduce energy consumption, maximize energy conservation, promote passive solar energy generation or other on-site electricity generation, and incorporate natural ventilation.*
b) *Policy NR-6.7: Residential Energy Efficiency. The County shall encourage residential units to be designed to maximize energy efficiency.*

Our comments

We appreciate the use of "shall" rather than "should" but how does one measure the outcome of ***encouragement*** with respect to energy efficiency, or for that matter, the success of ***promoting*** passive solar energy generation. 29-2

We ask that the policies change the word "encourage" to "require". "Encourage" does not reflect the urgency to deal with the existential threat of climate change. We also ask that the County include the actual LEED rating system set standards that will indicate whether the Developer has made sufficient effort to actually implement the standards that are actually in use in the building industry. Again, The County EIR must show the projected greenhouse gas emissions after the required changes are made.

Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area)

"The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. The net SAP area would generate 373,896 MTCO2e/year after implementation of Mitigation Measure 4.7-2a. PRSP would generate 195,014 MTCO2e/year after implementation of Mitigation Measure 4.7- 2a. The total GHG emission offset requirement would be 193,914 MTCO2e, or 27.14 MTCO2e/year for each residential unit in the PRSP area."

Sierra Foothills Audubon Society's mission is to work within our community to promote appreciation of and protection for birds and their habitats.

If the buildings including residential and non-residential all comply with zero net energy as required by Title 24 in 2020, then there will be no need for this mitigation. 29-3

The DEIR refers to the mpower program. *MPOWER is a local program in Placer County that provides financing to property owners for the installation of energy and water efficiency retrofits and renewable energy systems. Investing in mPOWER is consistent with the County's General Plan Policy 2.G.5, as described above in Section 4.7.3, "Regulatory Setting." Other examples of local direct investments include financing installation of regional electric vehicle–charging stations, paying for electrification of public school buses, and investing in local urban forests.*

There is no reason that the Developer shouldn't be required to make these investments on behalf of property owners as the project is being built. Otherwise, there is no guarantee that the property owner will go forward with the investments.

If zero net energy is implemented, we see no reason why mitigations as called for under 4.7.2b will be required. Electric vehicle-charging stations and bus-electrification must be required as part of the development to offset the vehicle trips from residents of the development. 29-4

Other suggestions

Paths - consider using compacted crushed rock for trails. It's cheaper, faster, permeable, and produces less CO2 emissions than concrete.
Ban grass lawns for water conservation leading to less energy use.
No natural gas lighting. LED only with nighttime glare minimized.
Electric car chargers for apartment use.
"smart glass" – electrochromatic windows
Drought resistant trees that do not block solar.
Solar pv in all parking lots. 29-5

In addition to our comments, the Alliance for Environmental Leadership will submit an Alternative 6 to the DEIR. This Alternative meets all of the County's Objectives and will be environmentally superior to the proposed Project and the other Alternatives included in the DEIR. We believe that under CEQA that the Citizen Initiated Smart Growth Plan (CISGP), produced by the Alliance for Environmental Leadership, must be fully analyzed as an Alternative. 29-6

Thank you for the opportunity to provide comments on the DEIR. We look forward to a thorough response from the County.

Sincerely,

Don Rivenes

Don Rivenes, Conservation Chair
Sierra Foothills Audubon Society
PO Box 1937
Grass Valley CA 95945
530-477-7502

Sierra Foothills Audubon Society's mission is to work within our community to promote appreciation of and protection for birds and their habitats.

Letter 29	Sierra Foothills Audubon Society Don Rivenes, Conservation Chair February 10, 2019

29-1 The comment requests that all residential development built under the project comply with the 2019 California Energy Code (CCR Title 24 Part 6) even if building permits are granted in 2019. Based on the current project schedule, there would not be building permits granted in 2019 and thus the first residential buildings constructed after EIR certification would be required to comply with the 2019 California Energy Code at a minimum. The comment incorrectly states that the 2019 California Energy Code results in zero net energy residential buildings. While the 2019 standards would require on-site solar photovoltaics, new residential buildings would be required to offset their electricity demand with the solar system, not their natural gas demand. The 2019 standards are also anticipated to reduce energy consumption by 7 percent (CEC 2018). While new residential buildings constructed to 2019 California Energy Code compliance may not be zero net energy, the remaining amount of project-wide emissions that exceeds 1,100 metric tons of carbon dioxide equivalent per year would be offset by carbon credits, as discussed in Mitigation Measure 4.7-2b of the Draft EIR. Through these efficiency achievements, on-site renewable systems, and offset of natural gas consumption, residential buildings would effectively become zero net energy.

The comment also requests that all nonresidential development be built to the 2030 California Energy Code and be zero net energy. At the time of writing the EIR, future iterations of the California Energy Code and their contents are not known beyond 2019. It would be speculative to assume that all new nonresidential buildings built to the 2030 standards would be zero net energy as the California Energy Commission has not yet determined if this is technologically and financially feasible. The 2019 California Energy Code would reduce energy consumption from residential buildings above three stories and nonresidential buildings by 53 percent, which is a greater reduction than the 2016 California Green Building Standards Codes that is included in Mitigation Measure 4.7-2a of the Draft EIR.

The comment adds that cool roofs should be required in connection with solar panels. A discussion on page 4.7-21 of the Draft EIR states, “All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2.” Although project buildings would be built to later iterations of the building codes, this requirement would carry forward.

It is important to note that at the time of writing the Draft EIR, the 2019 California Energy Code standards and associated energy savings were not yet available and thus the language in Mitigation Measure 4.7-2a reflects anticipated achievements in the new iteration of the California Energy Code.

29-2 The comment questions the project’s energy policies and asks how to measure outcomes of policies that encourage promotion of passive solar energy generation. CALGreen 2019 Building Code requires solar installation, or the equivalent energy reduction potential from energy-efficient design features, in all residential development by 2020. By 2030, non-residential development would be required to install solar or achieve the equivalent energy reduction potential. As stated in Mitigation Measure 4.7-2a, compliance with energy efficiency performance standards requires the applicant to demonstrate compliance using CEC-approved residential energy modeling software, which would allow the County to measure the effectiveness and potential GHG emission reductions that would occur. Mitigation also requires development to exceed the California Building Code Standards by meeting the minimum standards for Tier 1 and Tier 2 of the CALGreen Code, for nonresidential, multifamily, and single-family residential development, respectively. Energy efficient design features and solar photovoltaics may be used to achieve the necessary emission reduction requirements. LEED certification would be one option applicants can use to demonstrate compliance. Also, SAP Policy NR-6.7 has been revised as shown in Master Response 5: Greenhouse Gas Mitigation; the revised policy requires installation of solar photovoltaic systems and specific energy efficiency measures for new residential development.

29-3 The comment indicates that mitigation would not be required if buildings met zero net energy standards. See response to comment 29-1.

29-4 The comment references the Draft EIR's use of Placer County's mPOWER program and suggests that all project developers should be required to contribute to this program. This program will conclude at the end of 2019 and has been removed from the Draft EIR. (See Chapter 2, "Revisions to the Draft EIR," for the specific revisions.) However, this is not the only option for a local carbon offset that project applicants can invest in to comply with Mitigation Measure 4.7-2b. Such investments would be at the discretion of individual project applicants. Regardless of the carbon offset option chosen, all supporting evidence that the program meets the six required criteria (i.e., real, additional/surplus, quantifiable, enforceable, validated, and permanent) would be provided to the County prior to final map recordation or building permit issuance.

The comment also suggests that electric vehicle charging stations and bus electrification be required by the project to offset mobile-source emissions. As explained on page 4.7-20 of the Draft EIR, 10 percent of parking spaces at all multifamily residential buildings and all nonresidential buildings must include electric vehicle (EV) chargers. However, this amount of EV chargers would not fully offset the mobile-source emissions associated with the project. As described in response to comment 29-1, the California Energy Code does not require new residential or nonresidential buildings to be zero net energy under the 2019 standards, and thus, carbon offset credits are required to reduce the project's impact to climate change.

Bus electrification is considered infeasible at the project level because bus fleet purchases are made by transit authorities, such as Placer County Transit and Roseville Transit. The project would be committed to providing funds to local transit agencies through SAP policies and Draft EIR mitigation measures. See Master Response 5: Greenhouse Gas Mitigation. Further, CARB is in the process of developing a new regulation, the Innovative Clean Transit Regulation, that would require all public transit fleets to phase in zero emission buses, including battery electric and hydrogen fuel cell buses, such that all new fleet purchases are zero emission by 2030, prior to the buildout of the PRSP area. For these reasons, no revisions are necessary to the Draft EIR.

29-5 The comment suggests several GHG reduction measures. See Master Response 5: Greenhouse Gas Mitigation, which includes a discussion regarding the various GHG-reduction measures suggested by comments on the Draft EIR.

29-6 The comment suggests that the County evaluate the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

February 19, 2019

VIA E-MAIL

Letter 30

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov

RE: Comments on the Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012)

To whom it may concern:

Stanford Ranch I, LLC ("SR1") is the owner of Assessor's Parcel No. 017-250-076, an approximately 8-acre parcel located in the Foothills Business Park in the City of Roseville. This property is zoned for office/industrial use. SR1 has secured a 404 permit for filling wetlands on the property. In short, all development entitlements are in place.

Mitigation Measure 4.14-1b identified in the Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012) ("DEIR") requires the extension of Foothills Boulevard in the Sunset Area Plan area to connect with Foothills Boulevard in the City of Roseville to improve level of service on the local roadway network. The proposed alignment of this extension is via Duluth Avenue as depicted in DEIR Exhibit 3-7 (see Attachment 1) and as described in DEIR Section 3.8:

> **Foothills Boulevard (South).** As indicated in Section 4.14, "Transportation and Circulation," Mitigation Measure 4.14-1b requires the extension of Foothills Boulevard, to connect with Foothills Boulevard in the City of Roseville to improve level of service on the local roadway network. To implement this mitigation measure, Foothills Boulevard would be extended through the existing Duluth Avenue alignment then south of the plan area to connect to the existing northern terminus of Foothills Boulevard (in the City of Roseville), which is a two-lane roadway. This extension would require a bridge to cross Pleasant Grove Creek and would consist of a four-lane arterial roadway with a 100-foot right-of-way and additional landscape corridors and public-utility-easement (PUE) dedications on each side of the roadway. This alignment would use the existing Duluth Avenue corridor to create a connection from the southern boundary of the plan area, across Pleasant Grove Creek, to the existing terminus in the City of Roseville. As shown in Exhibit 3-23 and discussed above, the portion of the Foothills Boulevard extension outside the SAP was previously evaluated in the Foothills Business Park Annexation EIR, certified by the City of Roseville in October 2000.

30-1

The DEIR does not address how or when the County will acquire, or the precise location of, the requisite right of way along Duluth Avenue, including along the SR1 property described above, to accommodate this alignment. Accordingly, SR1 respectfully requests these issues be addressed in the County's response to comments and in the Final Environmental Impact Report.

Sincerely,

Stanford Ranch I, LLC
By: Larry D. Kelley, Sr.
Its: Manager

Letter 30	Stanford Ranch I, LLC Larry D. Kelley, Sr., Manager February 19, 2019

30-1 The comment requests information on when the County will acquire the right-of-way (ROW) for Foothills Boulevard on parcel 017-250-076. The parcel referenced has sufficient ROW to construct the ultimate facility and no further ROW will be needed for the Foothills Boulevard extension.

Letter 31

TRAINOR FAIRBROOK

ATTORNEYS AT LAW

Charles W. Trainor
ctrainor@trainorfairbrook.com

February 14, 2019

ELECTRONIC MAIL
AND FIRST CLASS MAIL

Steve Pedretti, Agency Director
Community Development Resource Agency
County of Placer
3091 County Center Drive
Auburn, California 95603
Email: SPedrett@placer.ca.gov

ELECTRONIC MAIL
AND FIRST CLASS MAIL

Crystal Jacobsen, Principal Planner
Community Development Resource Agency
County of Placer
3091 County Center Drive
Auburn, California 95603
Email: CJacobse@placer.ca.gov

Re: Comments on the Sunset Area Plan and Draft Environmental Impact Report for the Sunset Area Plan/Placer Ranch Specific Plan

Dear Mr. Pedretti and Ms. Jacobsen:

As you know, this law firm represents the United Auburn Indian Community ("UAIC"), the owner of the Thunder Valley Casino Resort ("Thunder Valley") and other properties within the Sunset Area Plan. As a governmental entity, UAIC appreciates the opportunity to review the Public Review Draft Sunset Area Plan (Draft SAP) and the Draft Environmental Impact Report (EIR) for the SAP/PRSP, and to provide comments thereto.

Comments on the Draft Sunset Area Plan

UAIC's comments on the Draft SAP are as follows:

- Western Placer Waste Management Authority Landfill: On page 1-8, the description of the Preserve/Mitigation Reserve (P/MR) land use designation includes mention of the Western Regional Sanitary Landfill as an appropriate use for this designation. If that is an appropriate use, it should be addressed in the discussion of "Land Use Buffer Standards" on pages 1-10 and 1-11. The SAP does not provide information on where the landfill could expand into the P/MR designated lands. Please remove this as a potential use for the P/MR designation and/or clarify the policies and standards regarding landfill expansion and buffering. In addition, the SAP should clearly state how much of the Eco-Industrial/ Manufacturing/WPWMA District would be available for any future landfill

31-1

980 Fulton Avenue ▪ Sacramento, California 95825-4558
Telephone (916) 929-7000 ▪ *Facsimile* (916) 929-7111 ▪ www.trainorfairbrook.com

expansion. Any expansion of the landfill toward Thunder Valley will be of concern to UAIC. 31-1 cont.

- Height Limit in EMU Zone: Within the SAP Implementing Zoning Regulations, *1.01.04 – Other Applicable Commercial and Entertainment Mixed-Use Zone Regulations*, the regulations allow for heights in the EMU zone up to 225 feet high. Since Thunder Valley is currently 227 feet high, we would request this limit to be increased to either 227 feet or 230 feet, so that Thunder Valley is not a non-confirming use. 31-2
- Some uses are defined in Section 1.05.02 of the Implementing Zoning Regulations, including food halls and mobile food truck plazas; however, these uses do not otherwise appear in the zoning regulations or Allowed Use and Permit Requirements tables, and should appear there. 31-3

Missing Appendices

- Page 9-3 of the Draft SAP mentions: "Appendix B of this Policy Document is the *Sunset Area Capital Improvement Plan (CIP)*." However, on the appendices divider page (just after page 2-28 of the Implementing Zoning Regulations) Appendix B is titled "Resolutions." Please provide the Capital Improvement Plan to allow for appropriate review and comment.
- Page 9-5 of the Draft SAP mentions: "These costs are addressed by the Sunset Area Infrastructure Finance Strategy (Appendix C)." However, no Appendix C is present and there are no public documents on the website showing the finance strategy. Please provide the Sunset Area Infrastructure Finance Strategy to allow for appropriate review and comment. 31-4

Utilities

- The Draft SAP does not show the utilities plans. Please provide the plans for utilities for appropriate review and comment. 31-5
- Assuming that the EIR correctly indicates that wastewater plan in Figure 3 of the Draft EIR's Appendix B (*Sunset Area Water, Wastewater, and Recycled Water Technical Report*), UAIC requests reconsideration of the routing of the Proposed Gravity Maine Pipeline down Athens Avenue between Industrial Avenue and Fiddyment Road. The current routing between Foothills Boulevard and Fiddyment Road, and then down Fiddyment Road to Placer Ranch, passes primarily through the Preserve/Mitigation 31-6

Reserve and the landfill, not through an area of development where landowners could better support, utilize and pay for the system at a lower cost. Please consider the benefits of turning the Main Pipeline down Foothills Boulevard at Athens Avenue to the south to Placer Ranch where it would be supported by the landowners on each side of Foothills Boulevard, saving expense and causing less of an environmental effect.

31-6 cont.

Comments on the Draft Environmental Impact Report for the Sunset Area Plan/Placer Ranch Specific Plan

Off-Reservation Study/Environmental Review

UAIC is planning for the buildout of Thunder Valley, and the associated entertainment and recreational facilities. A tribal environmental impact report was certified in 2009 and three subsequent addenda have been published since, as listed below:

- Thunder Valley Casino Expansion Final Tribal Environmental Impact Report (TEIR), June 2008 (SCH: 2007062072)[1]
- Thunder Valley Casino Expansion TEIR Addendum, August 2009[2]
- Thunder Valley Casino Expansion TEIR Addendum 2, March 2016[3]
- Thunder Valley Casino Expansion TEIR Addendum 3, May 2017[4]

31-7

Please confirm that full buildout of Thunder Valley and the entertainment and recreational facilities, as approved under the TEIR and its subsequent addenda (including traffic, utilities, public services, alternatives, etc.), is properly considered throughout the EIR, and is not in conflict with the TEIR.

[1] Analytical Environmental Services (AES), 2008a. Thunder Valley Casino Expansion Draft Tribal Environmental Impact Report. February 2008.
AES, 2008b. Thunder Valley Casino Expansion Revised Draft Tribal Environmental Impact Report. June 2008.
AES, 2008c. Thunder Valley Casino Expansion Final Tribal Environmental Impact Report. June 2008.
[2] AES, 2009. Thunder Valley Casino Expansion Tribal Environmental Impact Report Addendum. August 2009.
[3] Environmental Science Associates (ESA), 2016. Thunder Valley Casino Expansion Tribal Environmental Impact Report Addendum 2. March 2016
[4] Environmental Science Associates (ESA), 2017. Thunder Valley Casino Expansion Tribal Environmental Impact Report Addendum 3. May 2017

Steve Pedretti, Agency Director
Crystal Jacobsen, Principal Planner
Re: Comments on the Sunset Area Plan and Draft Environmental Impact Report for the Sunset Area Plan/Placer Ranch Specific Plan
February 14, 2019
Page 4

Project Description

- Pages 3-5, 4.10-3: EIR incorrectly identifies Thunder Valley Casino Resort as having 297 hotel rooms. The correct number is 408 rooms (per February 28, 2018, letter to County). 31-8
- Page 3-15, Table 3-1: Make changes to the table to reflect the maximum 2.00 FAR in the Entertainment Mixed-Use Designation, as shown in Table 1-1 in the Draft SAP. 31-9
- Multifamily residential development in EMU designation: On page 3-15, Table 3-1 shows that multifamily residential development is allowed in the EMU designation at up to 30 dwelling units (dus) per acre. Furthermore, on page 3-11 (as well as page 1-3 of the SAP), the EIR states: "The EMU designation also anticipates the potential need for residential uses to support the workforce employed in the area." One page 3-16, the EIR states: "In particular, the EMU designation is expected to generate the need for workforce housing… Accordingly, [this] [designation] include[s] standards that assume between 10 and 30 dwelling units per net acre, respectively, for areas proposed for housing." UAIC supports allowing up to 30 dus/acre in the EMU land use designation. However, on page 6-4, Table 6-1, the EIR assumes no multifamily residential development in the Net SAP area. The EIR should consider and analyze the potential environmental effects that, at buildout, the EMU designation would include a certain amount of multifamily residential development. 31-10
- Page 3-28, Table 3-3: Please confirm that full buildout of the casino and entertainment facilities, as approved under the TEIR and subsequent addenda, is included in the 2,615 ksf assumed for Phase 1 buildout of the SAP in the EMU land use designation. 31-11
- Page 3-14, Preserve/Mitigation Reserve: The description of the Preserve/Mitigation Preserve land use designation includes mention of the Western Regional Sanitary Landfill as an appropriate use for this designation. The Project Description does not provide information on where the landfill could expand into this area. As stated in the February 28, 2018 letter to the County, any expansion of the landfill toward Thunder Valley will be of concern to UAIC. 31-12
- Project Description: There is no mention of the Western Regional Sanitary Landfill's future plans to expand. This expansion is of concern and the potential for such an expansion should be disclosed in this document, along with a map showing the current location and the proposed expansion area. Page 3-29 mentions a "proposed 2,000-foot landfill buffer". There is no map showing where this landfill buffer is located. Page 4.8-35 states "The proposed SAP includes reduction of the 1-mile landfill buffer to 2,000 feet 31-13

for residential uses, or as close as 1,000 feet with approval of a specific plan, master plan, or development agreement." Where is this buffer and how does the expansion of the landfill affect the surrounding development? 31-13 cont.

Cultural

- Pages 4.5-5 through 4.5-11 - Tribal Cultural Resources.

Appendix B of the EIR (*Sunset Area Water, Wastewater, and Recycled Water Technical Report – Wastewater Treatment Report)*

UAIC presently operates its own wastewater treatment facility, but will, when public sewer is available in Athens Avenue, most likely want to utilize that public utility and close its own wastewater treatment facility. Please confirm with technical personnel that they have taken into account Thunder Valley and the Tribe's other properties in the design of the wastewater treatment system for the SAP. 31-14

Alternatives

As stated previously, UAIC supports adoption of the proposed project, with its requested changes. However, the alternatives to the project must also be feasible and provide enough information to provide a certain level of certainty to landowners on the repercussions of approval of any of the alternatives. In addition, the buildout of the casino and entertainment facilities consistent with the TEIR and subsequent addenda should be reflected in all alternatives.

- Alternative 1: No-Project–1997 SIA Plan Alternative 31-15
    - Page 6-10, Table 6-3: The 81 ksf shown in the retail land use type is not sufficient to reflect the full buildout of the casino and entertainment facilities.
    - Page 6-10: The text and Table 6-3 should reference the full buildout of the casino and entertainment facilities as part of the "no project" conditions.
- Alternative 2: Reduced Scale
    - UAIC does not support this alternative. Under this alternative, the EIR assumes that maximum building heights would be reduced to 60 feet. As stated previously, UAIC contends that the maximum building height in the EMU/AD zone should be at least 225 feet. 31-16
    - The EIR assumes a transition zone for this alternative that would require a single-story maximum height within 500 feet of an existing preserve or land outside the

SAP, 100-foot landscaped buffer, and 100-foot landscaped greenbelt. However, the EIR does not include a map showing where these would be located. Please include a map that shows what areas would be affected by the transition zone and buffer requirements.

- The EIR asserts that this alternative would result in reduced aesthetic impacts. However, the 227-foot casino hotel tower is already developed. Individual perception of aesthetic impacts may differ greatly. UAIC does not agree that a reduced height alternative would result in lesser aesthetic impacts.

31-16 cont.

- Alternative 3: Reduced Footprint, Reduced Development Potential
  - Page 6-17, Exhibit 6-2: In this alternative, UAIC-owned land would be preserved as part of the Preserve/Mitigation Reserve land use designation. In addition, the total allowable square footage of development in the EMU district would drop by 275 ksf to 2,340 ksf. UAIC does not support this alternative. This alternative would reduce developable land owned by the Tribe and isolate the casino from other future uses. UAIC is not in favor of any alternative that reduces its ability to develop properties it owns, thereby reducing UAIC's self-sufficiency.

31-17

- Alternative 4: Reduced Footprint, Similar Development Potential
  - Page 6-23, Exhibit 6-3: In this alternative, UAIC-owned land would be preserved as part of the Preserve/Mitigation Reserve land use designation.
  - While the EIR states that this alternative does not reduce development potential, there are no assurances on how the development potential would remain. In order to maintain the development potential, the plan must account for increased FAR and building heights. Please clarify what measures would be put into place to ensure that overall development potential is not decreased. More definition of this alternative is needed to provide certainties on the potential constraints.
  - UAIC does not support this alternative. This alternative would reduce developable land owned by the Tribe and isolate Thunder Valley from other future uses and surrounding development. UAIC is not in favor of any alternative that reduces its ability to develop the properties it owns, thereby reducing UAIC's self-sufficiency.

31-18

- Alternative 5: Reduced VMT

- Page 6-25: This alternative assumes no nonresidential development in the EMU designation. As already discussed previously, the EIR (Table 6-1) assumes no multifamily residential development in the EMU designation (or anywhere outside of the PRSP). Table 6-6 also shows no multifamily residential development outside the PRSP. This is not a feasible alternative as it would remove most (if not all) development potential from UAIC-owned property.
- Page 6-25, Table 6-6: This alternative incorrectly assumes no development in the EMU designation. At the very least, this alternative must reflect full buildout of the casino and entertainment facilities, and those rights it has under the existing TEIR.
- UAIC does not support this alternative. This alternative would reduce developable land owned by the Tribe and isolate Thunder Valley from other future uses and surrounding development. UAIC is not in favor of any alternative that reduces its ability to develop properties it owns, thereby reducing UAIC's self-sufficiency.

31-18 cont.

Our client looks forward to continuing government-to-government discussions on this important project with the County.

Very truly yours,

Charles W. Trainor

CWT:skc
3671053.1739943.1

Letter 31 | United Auburn Indian Community
Trainor Fairbrook
February 14, 2019

31-1 The comment notes that the Western Regional Sanitary Landfill is incorrectly referenced on page 1-8 of the SAP in the description of the Preserve/Mitigation Reserve Land Use Designation description. This reference on page 1-8 of the SAP notes that the Western Regional Sanitary Landfill's proximity to the Preserve/Mitigation Reserve Land Use Designation provides a buffer between preserve/mitigation lands and incompatible uses. It is not listed as a use anticipated within the Preserve/Mitigation Reserve Land Use Designation.

31-2 The comment requests that the height limit in the SAP EMU zone district be increased to either 227 or 230 feet so that the Thunder Valley (casino) is not a non-conforming use. The project description currently allows for up to 225 feet in the EMU zone district for certain uses. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration.

31-3 The comment notes that some new uses defined in Section 1.05.02 of the SAP Implementing Zoning Regulations do not appear in the allowed use tables for any zone district. The omission of these uses in the allowed use tables was made in error. These uses have been added to the EMU and IC zone district in the Final SAP.

31-4 The comment notes that there is a discrepancy with the title for Appendix B of the SAP. This error has been corrected in the Final SAP. The comment also requests for the Capital Improvement Plan be provided early enough to allow for appropriate time to allow for review and comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration.

31-5 The comment suggests that the SAP does not include a utilities plan. The SAP policy document does not contain a utilities plan; however, utility plans for the SAP are included within the Sunset Area Water, Wastewater, and Recycled Water Technical Report which is included in Appendix B of the EIR.

31-6 The comment asks the County to consider another alignment for the sewer line. The sewer alignment is based on the preferred option from the Sewer Service Analysis for the Area Surrounding Athens Avenue study.

31-7 The comment asks whether full buildout of Thunder Valley and the associated entertainment and recreational facilities is properly considered in the Draft EIR. The Thunder Valley Expansion EIR (June 2008) and its addenda (August 2009, March 2016, and May 2017) cover the UAIC property north of Athens Boulevard and the overflow parking area south of Athens Boulevard. The expansion project, including the hotel, casino, and parking structure, was completed prior to commencement of the Draft EIR, so it is included in the existing conditions baseline, as is the outdoor amphitheater. Future development of the overflow parking lot and all other EMU-designated parcels south of Athens Boulevard and east of Foothills Boulevard is, however, covered by the Phase 1 EMU development capacity described in Table 3-3 in the Draft EIR.

31-8 The comment provides a correction to the number of hotel rooms at Thunder Valley Casino Resort. In response to this comment, the second paragraph on page 3-5 of the Draft EIR is revised as follows:

> There have, however, been some business expansions and new development activity during this time within the plan area. Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the largest new development activity within the plan area since 1997, having expanded to become a full-service casino with a ~~297~~408-room hotel, spa, concert, and gaming facility. Additionally, some core industrial uses have started to take hold in the southeastern corner of the plan area.

In response to this comment, the second full paragraph on page 4.10-3 of the Draft EIR is revised as follows:

> The plan area experienced some business expansions and new development activity since 1997. Thunder Valley Casino Resort, located at the intersection of Athens and Industrial Avenues, is the most significant new development in the plan area since 1997, now with a ~~297~~408-room hotel, spa, concert venue, restaurants, and gaming facility. Additionally, some core industrial uses have been developed in the southeastern portion of the plan area.

These revisions constitute minor clarifications and do not affect the analysis or conclusions of the Draft EIR.

31-9 The comment points out a discrepancy between Table 3-1 in the Draft EIR and the SAP in the FAR for the EMU land use designation. This discrepancy was made in error. In response to this comment, Table 3-1 on page 3-15 of the Draft EIR is revised as follows:

Table 3-1 SAP Development Density by Land Use Designation

Land Use Designation	Acres	Floor Area Ratio		Dwelling Units per Acre
		Low	High	
General Commercial	34.2	0.15	0.75	–
Entertainment Mixed-Use	516.8	0.15	~~1.00~~ 2.00	10-30
Business Park	147.3	0.20	0.50	–
Innovation Center	1,244.7	0.20	0.50	10-30
Eco-Industrial	927.4	0.20	0.60	–
Light Industrial	749.9	0.20	0.50	10-30
Public Facility	6.3	–	–	–
Preserve/Mitigation Reserve	1,943.4	–	0.02	–
Urban Reserve	320.4	–	0.02	–
PRSP	2,213.3	See Table 3-4	See Table 3-4	See Table 3-4
Total	**8,103.7**			

Source: Information provided by Mintier Harnish in 2017

This correction does not result in changes to the Draft EIR analysis or conclusions. No further revision to the Draft EIR is necessary.

31-10 The comment notes that Table 6-1 in the Draft EIR assumes no multi-family residential development in the net SAP area. This omission was made in error. In response to this comment, Table 6-1 on pages 6-4 and 6-5 of the Draft EIR is revised as follows:

Table 6-1 Project Development at Buildout

Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Single-Family Residential[1]	3,082 du	~~2,460~~ 0 du	~~5,542~~ 3,082 du
Age-Restricted Residential	1,050 du	0 du	1,050 du
Multifamily Residential[2]	1,504 du	~~0~~ 2,458 du	~~1,504~~ 3,962 du
Retail[3]	1,640 ksf	220 ksf	1,860 ksf
Office[4]	1,241 ksf	1,110 ksf	2,351 ksf
Industrial[5]	1,658 ksf	11,440 ksf	13,098 ksf
Innovation Center/R&D[6]	901 ksf	12,000 ksf	12,901 ksf
Entertainment Mixed Use	0 ksf	3,060 ksf	3,060 ksf
University	30,000 students	0 students	30,000 students
Public Facilities	10.3 ac	6.3 ac	16.6 ac
Parks/Open Space	69.8 ac	0.0 ac	69.8 ac

Table 6-1 Project Development at Buildout

Land Use Type	PRSP Area	Net SAP Area	Total Project Area
Preserve/Mitigation Areas	264.8 ac	2,263.8 ac	2,528.6 ac

Notes: ac = acres; du = dwelling units; ksf = 1,000 square feet; R&D = research and development.

[1] All medium-density residential uses are assumed to be single-family (rather than multifamily) residential.

[2] All high-density residential uses are assumed to be multifamily residential.

[3] All commercial uses (General Commercial, commercial components of Commercial Mixed Use and Campus Park) assume a highest trip-generating condition of 100% retail space.

[4] Office uses include office components of Commercial Mixed Use and Campus Park in the PRSP area and Business Park in the remainder of the SAP area.

[5] Industrial uses include light industrial and warehouse components of Campus Park in the PRSP area and light industrial and eco-industrial land uses in the remainder of the SAP area.

[6] Innovation Center/Research & Development include the Research & Development component of Campus Park in the PRSP area and Innovation Center in remainder of the SAP area.

Source: Information provided by MacKay & Somps and Mintier Harnish and compiled by Ascent Environmental in 2018

This correction does not result in changes to the Draft EIR analysis or conclusions. No further revision to the Draft EIR is necessary.

31-11 The comment requests confirmation that the full buildout of the casino and entertainment facilities is included in the 2,615 KSF assumed for the SAP in Table 3-3 in the Draft EIR. See response to comment 31-7, above, regarding how the Draft EIR considers full buildout of Thunder Valley.

31-12 The comment notes that the WRSL is incorrectly referenced on page 3-14 of the Draft EIR. This reference on page 3-14 of the Draft EIR notes that the Western Regional Sanitary Landfill's proximity to the Preserve/Mitigation Reserve Land Use Designation provides a buffer between preserve/mitigation lands and incompatible uses. It is not listed as a use anticipated within the Preserve/Mitigation Reserve Land Use Designation.

31-13 The comment notes that the Draft EIR does not reflect the WRSL's future expansion plans. At the time of release of the NOP for the Draft EIR, the specific expansion plans for the landfill were unknown and therefore not described specifically in the Draft EIR analysis. However, the expansion is identified in the Draft EIR's cumulative projects list. See Table 4.0-2 and Exhibit 4.0-1. The comment also asserts that there is no map included in the Draft EIR depicting the SAP proposed sanitary landfill buffers. SAP Figure 1-3 includes a map of the SAP proposed land use buffers. To provide greater clarity, the Draft EIR has been modified to include this map as Exhibit 3-27. See Chapter 2, "Revisions to the Draft EIR," for revised Exhibit 3-27.

31-14 The comment requests confirmation that Thunder Valley and the Tribe's other properties have been accounted for in the design of the wastewater treatment plan for the SAP. The Sewer Service Analysis for the Area Surrounding Athens Avenue study includes 47 acres of Thunder Valley Casino to the north of Athens Avenue and all areas south of Athens Avenue. No revisions to the Draft EIR are necessary.

31-15 The comment requests changes to Alternative 1: No-Project—1997 SIA Plan Alternative. The No Project—1997 SIA Plan Alternative provides development capacity data based on information in the 1997 SIA Plan. The information presented in the No Project—1997 SIA Plan Alternative is not based on individual planned projects/expansions (other than the development specifically identified in the 1997 SIA). This is consistent with CEQA requirements, as described above in response to comment 16-1. It should be noted that the approval of the No-Project—1997 SIA Plan Alternative would mean that the proposed project would not move forward and the existing 1997 SIA Plan would remain in place. No additional development restrictions would occur, beyond those currently in place, as a result if the No Project—197 SIA Plan Alternative were implemented.

See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis.

31-16 The comment expresses opposition to and concerns with Alternative 2: Reduced Scale. The comment requests that the height restriction under the alternative be increased from 60 feet to 225 feet. However, this would defeat the purpose of the alternative, which seeks to reduce significant aesthetic impacts of the project related to changes in site character by reducing the scale of development. No changes to the Draft EIR are necessary.

The comment also requests a graphic to show where height restrictions and landscape buffers would be applied along existing and proposed preserves, and near land outside the SAP area designated for long-term agricultural use. Because future preserve areas within the SAP area would be primarily required as a matter of policy applied to individual development projects, a map cannot be generated showing these areas. The Draft EIR includes graphics showing existing preserves (Exhibit 4.4-1). The land outside the SAP area designated for long-term agriculture exists primarily along the northwestern edge of the SAP area near the Urban Reserve District and the Innovation District (see Exhibit 3-4). Most other SAP properties adjacent to land designated agricultural are within the SAP's Preserve/ Mitigation Reserve District. Because a map cannot be produced for some of the criteria and because the other criteria are straightforward and do not require illustration, no revisions to the Draft EIR are necessary.

See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis.

31-17 The comment expresses opposition to and concerns with Alternative 3: Reduced footprint, Reduced Development Potential. The comment provides reasons that it is opposed to the alternative, primarily based around a reduction in the land and development potential in the EMU, but the comment does not identify any flaws with the alternative related to feasibility, or any issues with the environmental analysis related to the alternative. These comments will be taken into consideration by decisionmakers when deliberating on the SAP/PRSP. See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis. No changes to the Draft EIR are necessary.

31-18 The comment expresses opposition to and concerns with Alternative 4: Reduced Footprint, Similar Development Potential and Alternative 5: Reduced VMT. Regarding Alternative 4, the comment suggests that no assurances are provided regarding how the alternative would maintain development potential. Although "assurances" are not required by CEQA for an alternatives analysis, a similar level of development potential as the project would be maintained by allowing increased net density of development, as stated in the Draft EIR (page 6-21). Regarding Alternative 5, the comment indicates that the development assumptions in the EMU are incorrect/infeasible, due to lack of multifamily residential development. The County does not consider the changes to the EMU as rendering the alternative infeasible, although it does impinge on the alternative's ability to meet project objectives. Although the commenter does not support these alternatives, they are appropriate for consideration in the Draft EIR. See Master Response 1: Alternatives Analysis for information regarding the overall adequacy of the Draft EIR's alternatives analysis. No revisions to the Draft EIR are required.

From: Bj <bjmakesithappen@aol.com>
Sent: Sunday, January 13, 2019 8:22 PM
To: Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedinger-Cecil
Subject: Strongly opposed to Whitehawk Development in Granite Bay

Letter 32

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: “The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300.”

The County has "dumped" 3 DEIR's upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs. **32-1**

The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = “kill and pay an in-lieu fee”, and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements. **32-2**

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment. **32-3**

Thank you in advance for your consideration of my request.

BJ Baker
Waterford II HomeOwners Assoc.
Assistant Secreatary

1

Letter 32	Waterford II Homeowners Association B.J. Baker, Assistant Secretary January 13, 2019

32-1 The comment raises issues related to the government shutdown. See response to comment 11-1, which addresses this issue in detail.

A portion of the comment (including the subject line) references the Whitehawk I and II Projects in Granite Bay, for which the County issued a Draft EIR in November 2018 and a Final EIR in February 2019. These projects are not associated with the SAP/PRSP or EIR. Nevertheless, the comment also speaks to the number of EIRs issued by the County in the same timeframe and the length and complexity of the documents.

Section 15105(a) of the State CEQA Guidelines requires that Draft EIRs are circulated for a minimum of 30 days, unless state agency review is required, in which case the review period must be 45 days (with certain exceptions). The Draft EIR was circulated for public review and comment for a period of 64 days, from December 18, 2018 to February 19, 2019. The County did receive one comment letter within a week after the close of the review period, and while the County is not obligated under CEQA to respond to late comments, the County is nonetheless providing responses in this Final EIR to that late comment letter (these are included in this Final EIR under the category, "Late Comments"). Any comment received over a week after the close of the review period are not included in the Final EIR, but responses will be provided in the staff report package that will be provided to the Placer County Planning Commission and Board of Supervisors.

The comment expresses concern about the number of EIRs issued by the County in the same timeframe and the length and complexity of the documents, implying that the comment period should have been extended. Section 15141 of the State CEQA Guidelines states that Draft EIRs should normally be less than 150 pages, and Draft EIRs of unusual scope or complexity should normally be less than 300 pages. These recommended maximum document lengths are provided as general guidance, not limitations. Page lengths differ for each EIR and will typically be longer for program EIRs such as this one, which includes both program- and project-level components. The County extended the public review period from its typical 45 days to 67 days and believes this is sufficient to comment on the Draft EIR. The public review period complies with CEQA requirements.

32-2 A portion of the comment references the Placer Retirement Residence Project in Granite Bay, for which the County issued a Draft EIR in December 2018 and a Final EIR in March 2019. This is a separate project and is not associated with the SAP/PRSP or EIR. Nevertheless, the comment also speaks to the number of EIRs issued by the County in the same timeframe and the government shutdown that overlapped with the comment periods. See response to comment 11-1 regarding the government shutdown and the public's ability to provide comments.

32-3 The comment reiterates concerns expressed above about page limits and requests an extension of the comment period. See response to comment 32-1, above, regarding these topics.

3.2.3 Individuals

From: Amber Beckler <zagnut@hotmail.com>
Sent: Sunday, January 13, 2019 4:04 PM
To: Shirlee Herrington; EJ Ivaldi; CRSchimd@placer.ca.gov; Crystal Jacobsen; KKeding@placer.ca.gov
Subject: Request for extension on WH I and II

Letter 33

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

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CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300."

The County has "dumped" 3 DEIR's upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs. 33-1

The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request.

Thank you,

Amber Beckler
8970 Benton Acre Rd
Granite Bay, CA 95746

Letter 33	Amber Beckler January 13, 2019

33-1 This comment letter is virtually the same as the content of comment letter 32. See responses to comments 32-1 through 32-3.

From: jan bell <jlb95603@yahoo.com>
Sent: Friday, February 22, 2019 3:36 PM
To: Shirlee Herrington
Subject: Comment on Draft EIR for the Sunset Industrial Area Project and Placer Ranch Specific Plan

Letter 34

Ms. Herrington,

As a retired business executive, a long term investor in real estate projects and a 25 year resident of Placer County, I am disappointed in the Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan. It is unimaginative as it follows the flawed suburban sprawl we have used for over half a century which negatively impacts our community and is devoid of any innovation in urban design. Not only that, the Draft EIR is also incomplete because it fails to suggest, or properly analyze, an Alternative Project that lessens adverse and avoidable impacts. The absence of such an Alternative does not allow the County to make an informed decision about the Project.

I respectfully request that you recirculate the DEIR and that the **Citizen Initiated Smart Growth Plan, created by the Alliance for Environmental Leadership**, be analyzed as a Project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives as set forth in the DEIR.

34-1

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Jan Bell
2581 Fawn Hill Lane
Auburn, CA 95603
jlb95603@yahoo.com

(530) 887-1083

Letter 34 Jan Bell
February 22, 2019

34-1 The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

The comment also states that the Draft EIR is incomplete because it does not include an alternative that would lessen the project's impacts. This is incorrect. The Draft EIR's alternatives were designed specifically to reduce the project's significant impacts on the environment. See Master Response 1: Alternatives Analysis for additional information regarding the adequacy of the Draft EIR's alternatives analysis.

As to the request that the County recirculate the Draft EIR with an analysis of the Citizen-Initiated Smart Growth Plan, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, January 14, 2019 11:56 AM
To: Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedinger-Cecil; Clayton Cook
Subject: Request for extension of Environmental Document Reviews

Letter 35

Good morning,

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released at the same time for public review and input: The Sunset Area Plan/Placer Ranch Specific Plan, Placer County Government Center Master Plan Update, WhiteHawks I & II DEIR, and Placer Retirement Residence DEIR. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

Several residents have expressed concerns with the timing of multiple environmental documents, the excessive length of the documents, the complexity of the environmental documents, and Placer hearings scheduled so close to religious holidays. Resident appeals to postpone the documents and extend these document deadlines has also been expressed in public meetings. In addition to the environmental documents released at the same time, the WhiteHawks Planning Hearing, the Zoning Text Amendment Board of Supervisors Hearing and Tiny Houses on Wheels Board of Supervisors hearing were scheduled placing heavy burden on residents.

35-1

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be **less than 150** pages and **for proposals of unusual scope** or complexity should normally be **less than 300**."

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request,
Cheryl Berkema

Letter 35	Cheryl Berkema January 14, 2019

35-1 This comment letter is virtually the same as the content of comment letter 32. Therefore, this response simply cross-references to responses to this letter. See responses to comments 32-1 through 32-3.

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, February 18, 2019 2:26 PM
To: Shirlee Herrington
Cc: Cheryl Berkema
Subject: Sunset Area Plan Feb 14 Hearing Comments

Letter 36

Hi Shirlee,

Enclosing the comments that I read in person at the Placer County Hearing Feb 14, 2014. Please add these to the administrative record.

February 14, 2019

Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Subject: Sunset Area Plan hearing
Attn: Shirlee Herrington, Environmental Coordinator (sherring@placer.ca.gov)

Placer County Planning Commission:

In December 2018, several concerned citizens made public and written requests of Placer Planning that the many significant projects being introduced by Planning be rescheduled and staggered appropriately to allow adequate time for public review. Time extensions were also requested for the projects due to the excessive document sizes, which were far beyond CEQA guidelines for documents, many of these projects were thousands of pages in length. In addition, several major hearings were also scheduled within the same timeframe completely inundating the public. The Sunset Area Plan, the largest regional project known to Placer County was introduced during this onslaught of document dumping, again, completely overwhelming the public. The Sunset Area Plan is a project a decade in the making. The Sunset Area Plan document was so large that the County had to get a waiver from the State Clearinghouse to divide it into multiple pieces as there is a 300-page limit for documents. Additionally, The Sunset DEIR review period was also during a federal shutdown prohibiting inquiries on housing, transportation, federal environment issues, and for the Placer County Conservation Program.

CEQA's purpose is to (1) inform governmental decision-makers and the public about potentially significant environmental effects of proposed projects, (2) identify ways that environmental damage can be avoided or significantly reduced, (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures, and (4) disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved. Why is Placer Planning putting up roadblocks for residents to adequately review and provide informed comments on a project of such importance as CEQA requires?

The Sunset Industrial Area Plan previously proposed by Placer County a decade ago made great promises, however the project objectives were never realized. The Sunset Industrial Area Plan was shown to not be economically feasible. That huge associated project price tag to present the project was picked up by Placer County residents. Placer County is introducing a similar proposal and expecting different results. How and when do we expect Placer County to be paid back for these expenditures from developers?

The Sunset Area Plan is a Hodge podge of disjoint components assembled together largely to create a tax revenue base for Placer County and to benefit wealthy developers. The Sunset Area Plan is reminiscent of the urban sprawl projects of the 20th century, not a forward-looking project that has citizen's and environmental needs of the 21st century at the forefront.

36-1

1

The Sunset Area Plan as proposed is deficient in the following areas:

- No developers have committed to the Sunset Area plan putting the county (and taxpayers) at significant risk. The County being the applicant and approver is a conflict of interest.
- The County has failed to show that the project is economically feasible.
- No innovators were mentioned in the DEIR. Stating you are creating an innovation center does not mean they will come.
- No University has committed to the Sunset Area Plan. Conversely, universities have backed out of the plan. This presents significant risk to the project financials and does not meet the project objectives.
- Would destroy significant vernal pools, habitats, and endangered species.
- Will create a new affordable housing crisis. Hourly workers will not be able to afford housing in the Sunset area. Not only does this compound the housing crisis, it increases the vehicle miles traveled, as workers will need to travel to work in the Sunset Area.
- Will not create the jobs that are projected. The County has failed to show where these jobs are expected to come from.
- Will create close to a million daily vehicle trips a day. This also fails to meet project objectives.
- Is not energy efficient, will produce excessive greenhouse gas emissions, The Sunset Area Plan does not provide alternative sources of energy.
- CEQA does not allow the promise of future action associated with mitigation measures that are currently not feasible because the Placer County Conservation Program (PCCP) has not been adopted. Current laws should be referenced as mitigation measures.
- A huge number of significant impact mitigations are not funded, so cannot be viewed as feasible nor valid.

36-2

A project of this magnitude requires much more than a workshop, a public hearing and an article in the Sacramento Bee. Citizens should seriously question the urgency for pushing this project through and the lack of public outreach that the County has provided to the Sunset Area Plan. Placer County has already spent millions of tax payer dollars on implementing sections of the Sunset Area Plan- a plan that has not been approved or reviewed by the public. The Sunset Area plan, a project of regional significance has not been socialized with Placer residents.

I request that you consider the process that has been used to deliver the Sunset Area Plan as insufficient and recirculate the Sunset Area Plan DEIR with the Citizens Initiated Smart Growth Plan as an alternative on the Draft EIR with the minimum 2019 CEQA 120-day review period to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the Draft EIR.

36-3

You the Placer County Planning Commissioners have the opportunity to create something special for Placer County. A world class master planner that has designed for some of the most innovative companies in the world has created a vision for an ecosystem that can resonate with citizens, be less impactful on the environment and set example for projects to follow. This is a gift to Placer County. I hope you recognize the opportunity.

It was disappointing to hear Placer Planning claim during the presentation that the Significant and Unavoidable impacts were out of their jurisdiction and control. For the ~45 pages of DEIR impacts, CEQA and NEPA require responses to these impacts and analysis, to fail to do so would be in violation of State and Federal law.

Thank you for the opportunity to provide comments on the DEIR and process.
Sincerely,

Cheryl Berkema

Letter 36	Cheryl Berkema February 18, 2019

36-1 The comment describes that requests have been previously submitted to the Placer County Planning Commission asking that Placer County projects be rescheduled and staggered to allow adequate time for public review. CEQA requires a public review period of 45 days for EIRs that require state agency review, which was met and exceeded by the County with the provision of a 67-day review period for the project. There is no basis under CEQA to extend that timeframe.

Regarding the comment that the SAP document was so large that the County received a waiver from the State Clearinghouse to divide it into multiple pieces, this is incorrect. Many EIRs exceed 300 pages, especially EIRs evaluating the impacts of large and/or complex project. The State Clearinghouse does not require a waiver.

Regarding the comment that the Draft EIR review period occurred during a federal shutdown, prohibiting public inquiries on housing, transportation, federal environmental issues, and the PCCP, see response to comment 32-1. Also, see response to comment 11-1 regarding the potential effect of the federal government shutdown to constrain federal agencies' ability to provide comments on the Draft EIR.

Regarding the comment that the SIA Plan is not economically feasible, a market study was prepared by EPS, which evaluated the economic viability of the PRSP and SAP. The market study did not conclude that the PRSP or SAP was economically unviable, although it did identify a buildout period of over 80 years for the full SAP. The Draft EIR uses this buildout assumption throughout the environmental analysis for the SAP. However, the comment primarily raises issues regarding the County's investment in the plan. This is not an environmental issue and no further response is required regarding this issue.

The remainder of the comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions into consideration when making a decision regarding the project.

36-2 The comment lists the areas in which the SAP is purportedly deficient. Many of the items in this list relate to the merits of the project and do not raise environmental issues or issues with the adequacy of the Draft EIR. This response will focus on the items that relate to environmental issues.

The comment suggests the project would destroy significant vernal pools, habitats, and endangered species. The impacts related to biological resources are disclosed in Section 4.4, "Biological Resources." The Draft EIR concludes that impacts related to vernal pools and aquatic habitat and impacts to special-status species would be significant and unavoidable after implementation of mitigation measures identified. The comment does not raise issues with these conclusions or with the analysis of the Draft EIR.

The comment indicates that the project would create close to one million daily vehicle trips and suggests that this conflicts with project objectives. Trip generation for the Cumulative Plus SAP Buildout is provided in Table 4.14-35 in Section 4.14, "Transportation and Circulation," of the Draft EIR. The daily trip total is 561,635. The comment does not raise issues with the Draft EIR's conclusions or analysis.

The comment raises issues with the project's energy efficiency and GHG generation. The Draft EIR includes a thorough analysis of the project's GHG generation and energy efficiency in Sections 4.7 and 4.16, respectively. The comment does not raise issues with the Draft EIR's analysis or conclusions.

The comment suggests that mitigation measures related to the PCCP are infeasible because the PCCP has not been adopted. Mitigation measures in Section 4.4., "Biological Resources," that require mitigation under the PCCP include a separate set of measures that would be required in the case that the PCCP, including the Western Placer CARP and associated USACE programmatic permits, are not adopted, or are not available as a permitting and mitigation strategy for future projects. Therefore, the feasibility of mitigation measures included in the Draft EIR is not dependent on adoption of the PCCP. More details related to this issue are provided in Master Response 3: Placer County Conservation Program and Mitigation.

The comment suggests that mitigation measures are infeasible because they are not funded. The comment does not identify specific mitigation measures; therefore, specific responses cannot be provided. Project proponents and applicants would be responsible for funding mitigation measures associated specifically with project impacts.

Regarding the comment about hourly workers not being able to afford housing in the Sunset Area, the housing market is subject to the same forces of demand and supply as any other market. Demand for housing is determined by various factors, including housing prices, population (size of the market), household income, employment opportunities, transportation options and costs, interest rates, availability of credit, long-term economic outlook, and other factors. Housing supply is similarly impacted by a number of different factors, including housing cost, land value, landowner expectations and preferences, government regulations, availability of financing, and other factors. Market demand for housing comprises households with a range of incomes capable of affording a range of housing costs. Housing markets also contain a range of housing typologies (e.g., size, density, tenure, market-rate, subsidized) to meet different segments of demand. The project is envisioned to contain different housing options at various price points. These housing options include single-family homes of mixed densities, high-density multifamily homes, student housing, and subsidized affordable housing. This range of housing options is intended to accommodate a range of salary levels and meet market demand.

36-3 The comment expresses concern about the public outreach conducted for this project, requests that the County recirculate the Draft EIR with an analysis of the Citizen-Initiated Smart Growth Plan, and expresses concern about the County's presentation at the public hearing that characterized the project's significant and unavoidable impacts as being outside of the County's jurisdiction and control. These issues are addressed below.

CEQA requires, and allows for, numerous opportunities for the public to provide comments throughout the environmental review process. These comments help to guide the development of alternatives and the environmental analysis. Such opportunities include the public scoping process which occurs when the notice of preparation is published, formal public comment period after the release of the draft environmental document, as well as public hearings. These public input processes are described in detail in Section 1.3, "Environmental Review Process," of the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered. Going forward, several meetings will be held as part of the project approval process, and the public is invited to attend and provide comments at these meetings, which will include the Placer County Planning Commission and the Placer County Board of Supervisors.

As to the request that the County recirculate the Draft EIR with an analysis of the Citizen-Initiated Smart Growth Plan, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and

traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

Regarding the comment about the County's presentation at the public hearing that characterized the project's significant and unavoidable impacts as being outside of the County's jurisdiction and control, see Section 5.1, "Significant and Unavoidable Impacts," of the Draft EIR, which lists the project's significant and unavoidable impacts and also states,

> It should be noted that many of these impacts are considered unavoidable only because they would occur outside of Placer County's jurisdiction and the County could not ensure the enforcement of the otherwise feasible mitigation measures identified in this EIR.

CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (Public Resources Code [PRC] Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency's decisionmaker, in this case the Placer County Board of Supervisors, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; CCR Section 15093).

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Friday, February 22, 2019 4:58 PM
To: Shirlee Herrington
Cc: Cheryl Berkema
Subject: Sunset Area Plan DEIR feedback

Letter 37

February 22, 2019

Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Subject: Sunset Area Plan DEIR Feedback
Attn: Shirlee Herrington, Environmental Coordinator (sherring@placer.ca.gov)

Placer County Planning,

In December 2018, several concerned citizens made public and written requests of Placer Planning that the many significant projects being introduced by Planning be rescheduled and staggered appropriately to allow adequate time for public review. Time extensions were also requested for the projects due to the excessive document sizes, which were far beyond CEQA guidelines for documents, many of these projects were thousands of pages in length. In addition, several major hearings were also scheduled within the same timeframe completely inundating the public. The Sunset Area Plan, the largest regional project known to Placer County was introduced during this onslaught of document dumping, again, completely overwhelming the public. The Sunset Area Plan is a project a decade in the making. The Sunset Area Plan document was so large that the County had to get a waiver from the State Clearinghouse to divide it into multiple pieces as there is a 300-page limit for documents. The Sunset DEIR was not posted on the Placer EIR website until late January. The Placer County website upgrade broke Sunset Area Document links the final week of public review. Additionally, The Sunset DEIR review period was also during a federal shutdown prohibiting inquiries on housing, transportation, federal environment issues, and for the Placer County Conservation Program.

CEQA's purpose is to (1) inform governmental decision-makers and the public about potentially significant environmental effects of proposed projects, (2) identify ways that environmental damage can be avoided or significantly reduced, (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures, and (4) disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved. Why is Placer Planning putting up roadblocks for residents to adequately review and provide informed comments on a project of such importance as CEQA requires? 37-1

The Sunset Industrial Area Plan previously proposed by Placer County a decade ago made great promises, however the project objectives were never realized. The Sunset Industrial Area Plan was shown to not be economically feasible. That huge associated project price tag to present the project was picked up by Placer County residents. Placer County is introducing a similar proposal and expecting different results. How and when do we expect repayment of the millions of dollars that the County has invested?

The Sunset Area Plan is a Hodge podge of disjoint components assembled together largely to create a tax revenue base for Placer County and to benefit wealthy developers (so far unnamed, apparently not willing to commit to the project). This lack of developer commitment puts the County at great risk. The Sunset Area Plan is reminiscent of the urban sprawl projects of the 20th century, not a forward-looking project that has citizen's and environmental needs of the 21st century at the forefront.

The Sunset Area Plan as proposed is deficient in the following areas:

- No developers have committed to the Sunset Area plan putting the county (and taxpayers) at significant risk. The County being the applicant and approver is a conflict of interest.
- The County has failed to show that the project is economically feasible, neither in the short term 20-year time frame nor in the longer 80 year projected project buildout. 37-2

1

- No innovators were mentioned in the DEIR. Stating you are creating an innovation center does not mean they will come. The lack of innovators in the EIR is a significant impact to the economic feasibility of the project. The expected revenue from the innovation area of the project should be detailed in the EIR. This is a risk to the project. A major benefit stated in the EIR is the ability for University students to intern with the innovation area of the project.
- No University has committed to the Sunset Area Plan. Conversely, universities have backed out of the plan, showing lack of participation and commitment to the project. As the University is described to play an important part of the project both in terms of importance to the community and for jobs it would create, this is a significant impact. The project should not be approved without a committed University. This presents significant risk to the project financials and does not meet the project objectives.
- Would destroy significant vernal pools, habitats, and endangered species. species that are "fully protected" under the Fish and Game Code cannot be taken and moved as part of a mitigation plan. Center for Biological Diversity v. California Department of Fish and Wildlife (2015) 62 Cal.4th 204 .
- Will create a new affordable housing crisis. Hourly workers will not be able to afford housing in the Sunset area. Not only does this compound the housing crisis, it increases the vehicle miles traveled, as workers will need to travel to work in the Sunset Area.
- Will not create the jobs that are projected. The County has failed to show where these jobs are expected to come from.
- Will create close to a million daily vehicle trips a day. This also fails to meet project objectives.
- Is not energy efficient, will produce excessive greenhouse gas emissions, The Sunset Area Plan does not provide alternative sources of energy. GHG emissions create health hazards see California Supreme Court in *Sierra Club v. County of Fresno* (S219783)
- CEQA does not allow the promise of future action associated with mitigation measures that are currently not feasible because the Placer County Conservation Program (PCCP) has not been adopted. Current laws should be referenced as mitigation measures.
- A huge number of significant impact mitigations are not funded, so cannot be viewed as feasible nor valid. This needs to be addressed in the EIR
- The no build alternative was more impactful to the environment. This needs to be explained in the EIR in great detail.

37-2 cont.

A project of this magnitude requires much more than a workshop, a public hearing and an article in the Sacramento Bee. Citizens should seriously question the urgency for pushing this project through and the lack of public outreach that the County has provided to the Sunset Area Plan. Placer County has already spent millions of tax payer dollars on implementing sections of the Sunset Area Plan- a plan that has not been approved or reviewed by the public. When and how will taxpayers be repaid for these expenses since the County is acting as applicant for the project. One of the main objectives of the DEIR is to provide permanent conservation for the environment and endangered species yet the project is destroying the farmlands, riparian areas, and vernal pools. The conservation for the proposed mitigation lasts for only 50 years. The calculations for why the County states they are meeting this goal needs to be revisited either removing the reason that the project is considered as meeting the objective or making the conservation permanent.

I request that you consider the process that has been used to deliver the Sunset Area Plan as insufficient and recirculate the Sunset Area Plan DEIR with the Citizens Initiated Smart Growth Plan as an alternative on the Draft EIR with the 2019 CEQA 120-day review period as a minimum to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the Draft EIR.

37-3

You the Placer County Planning Commissioners have the opportunity to create something special for Placer County. A world class master planner that has designed for some of the most innovative companies in the world has created a vision for an ecosystem that can resonate with citizens, be less impactful on the environment and set example for projects to follow. This is a gift to Placer County. I hope you recognize the opportunity.

Thank you for the opportunity to provide comments on the DEIR process.
Sincerely,

2

Cheryl Berkema

Letter 37	Cheryl Berkema February 22, 2019

This comment letter is virtually the same as the content of comment letter 36. Therefore, the responses simply cross reference to responses to this letter.

37-1 See response to comment 36-1.

37-2 See response to comment 36-2.

37-3 See response to comment 36-3.

Letter 38

From: Larissa Berry <lzberry@peoplepc.com>
Sent: Sunday, January 13, 2019 2:40 PM
To: Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedinger-Cecil; Clayton Cook
Cc: Ashley Brown; GBCA; defendgb@gmail.com; AEL-Leslie Warren
Subject: Time extension request for upcoming DEIRs

Good evening,

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be **less than 150** pages and **for proposals of unusual scope** or complexity should normally be **less than 300**."

The County has "dumped" 3 DEIR's upon the public in an unreasonable timeframe. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs. 38-1

The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request,

Larissa Berry

Letter 38	Larissa Berry January 13, 2019

38-1 This comment letter is virtually the same as the content of comment letter 32. Therefore, this response simply cross-references to responses to this letter. See responses to comments 32-1 through 32-3.

Letter 39

From: Crystal Jacobsen
Sent: Friday, February 01, 2019 8:08 AM
To: Larissa Berry
Cc: Shirlee Herrington
Subject: RE: Prime farmland designation for SIA/PR project

Hi Larissa,

Impacts related to farmlands is outlined in the Agricultural Resources Chapter which is section 4.2 of the DEIR. I hope that helps.

Best,
Crystal

Crystal Jacobsen | Principal Planner, Advanced Planning Placer County Community Development Resource Agency Planning Services Division
3091 County Center Drive Ste. 140, Auburn, CA 95603
530.745.3000 (main) | 530.745.3085 (direct) | 530.745.3080 (fax)| cjacobse@placer.ca.gov

-----Original Message-----
From: Larissa Berry [mailto:lzberry@peoplepc.com]
Sent: Thursday, January 31, 2019 5:31 PM
To: Crystal Jacobsen <CJacobse@placer.ca.gov>
Subject: Prime farmland designation for SIA/PR project

Good morning Ms Jacobsen,

I have only begun delving into the massive EIR associated with the SIA/PR project. Could you please clarify or point me to the appropriate section within the DEIR as to the land description for the farmlands being absorbed by the project?

I am trying to determine if they are considered Class I or II soils mapped by the US Soils Conservation Department. If not, could you please provide the description of this particular acreage?

Thank you in advance
Larissa Berry

Sent from my iPhone

39-1

Letter 39	Larissa Berry January 31, 2019

39-1 The comment asks where in the Draft EIR farmlands that would be affected by the project are described, including their soil classification. Section 4.2, "Agricultural Resources," of the Draft EIR addresses this issue. Specifically, pages 4.2-3 through 4.2-7 describe the soil capability classification of soils within the project site.

From: Larissa Berry <lzberry@peoplepc.com>
Sent: Wednesday, February 13, 2019 9:01 PM
To: Shirlee Herrington; Sue Colbert; Megan Wood
Cc: Crystal Jacobsen; AEL-Leslie Warren; defendgb@gmail.com; GBCA
Subject: Comments for Public Hearing on the Sunset Industrial Area Plan

Letter 40

Ms. Herrington,

Please forward my comments to the Planning Commission for consideration in the public hearing on the Sunset Industrial Area Plan.

Thank you
Larissa Berry

Commissioners,

The Sunset Area Industrial Plan has been in the works for a number of years. Suddenly there seems to be an irrational need to rush through the DEIR review and public comment periods. This massive document in addition to multiple other documents of extraordinary length have been "dumped" on the public in a very short time frame producing an undue burden and violating the core of CEQA which mandates public input. The 2019 CEQA guidelines are for a review period of 120 days. Since there is yet no commitment from a University, the County has no time pressure and should extend the review period of a document that is too large to be downloaded as a single file.

Development of this nature should and must include those residents who will be forever impacted. The project was previously deemed economically infeasible. It appears that nothing has changed. No funds are available for mitigation of any of the 44 pages of Significant and Unavoidable Impacts. As such, we the residents of Placer County need to participate in and anticipate what ***this alone*** implies in fees, taxes, congestion, compromised public services such as emergency response, neglect of deteriorating infrastructure and roads that will be further stressed by a huge increase in numbers of homes and vehicles, availability and sourcing of water, etc.

The Alliance for Environmental Leadership is in the process of finalizing a "future forward plan" that is respectful of existing and new residents as well as the environment. I urge you to include their proposal as an alternative with less impact as required by CEQA and extend the review period to at minimum of 120 days. This County could lead the way in how development should be done - by doing it now.

40-1

Respectfully
Larissa Berry

Letter 40	Larissa Berry February 13, 2019

40-1 The comment expresses concern about the number of EIRs issued by the County in the same timeframe and the length and complexity of the documents. See response to comment 32-1 regarding CEQA requirements for public review periods, CEQA page limit recommendations, and requests for extension of the comment period.

The comment also states that the 2019 CEQA Guidelines require a review period of 120 days. This is not correct. As described in response to comment 32-1, Section 15105(a) of the State CEQA Guidelines requires that Draft EIRs are circulated for a minimum of 30 days, unless state agency review is required, in which case the review period must be 45 days (with certain exceptions).

Regarding the comment that the project is not economically feasible and that funds are not available for mitigation of the project's significant and unavoidable impacts, a market study was prepared by EPS, which evaluated the economic viability of the PRSP and SAP. The market study did not conclude that the PRSP or SAP was economically unviable. Regarding mitigation funding, see Master Response 9: Mitigation and Development Fees.

As to the request that the County recirculate the Draft EIR with an analysis of the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

Letter 41

February 21, 2019

Placer County Planning Commissioner,

Please accept my comments as part of the administrative record for the Sunset Industrial Area Specific Plan. I will preface my comments by stating that the extent of the project and the massive quantity of information presented to the public have far exceeded CEQA guidelines of 100 pages for a small project to 300 pages for a complex project. The number of documents being 'dumped" on the public within a short period of time, all exceeding 1000 pages with appendices, is in direct contradiction to the purpose of CEQA which is to inform the public of significant impacts so that they may appropriately comment and participate in the development process. 41-1

The Specific Plan sets forth a plan for development of the Sunset Industrial Area which is located outside the borders of Lincoln, Roseville and Rocklin. The project will utilize major arterial corridors including Highway 65, 80 and State Route 99. Because of the proximity of the proposed development to these residential and commercial centers, I am concerned about the cumulative impacts the development will have upon these established areas. Of particular concern is the Project's resulting increases in vehicular use and traffic. The traffic issues have two components - (1) level of service impacts to specific roadway sections; and (2) increases in vehicle miles travelled and daily vehicle trip, which in turn have impacts on air and water quality from added vehicular trips and impervious surface. The DEIR has not adequately analyzed or identified mitigation measure for these impacts. In addition, the DEIR's inadequate analysis of greenhouse gas emissions cumulative with these other established centers is an issue of statewide importance.

The DEIR has failed to address the cumulative impacts and ability to meet project required Levels of Service cumulatively with areas which have been identified as having no funding to mitigate to a less than significant level. As such, with no funding in the foreseeable future to remedy the traffic issues, the analysis must include their traffic numbers along with the proposed traffic increases as a result of the SIA development. The DEIR did not consider the impacts associated with this increase in vehicular use in Lincoln, Roseville and Rocklin. Placer County should analyze these impacts to determine that they can be mitigated to a less than significant level. Traffic impacts do not stop at borders of jurisdiction and the roadblocks being created due to lack of available funding in these adjacent cities must be evaluated to determine that Traffic requirements can be met **within** the project. 41-2

The CEQA Guidelines are clear that "[t]he DEIR demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context." (Cal. Code Regs., tit. 14, § 15125(c).) Here, the DEIR does not include an analysis of the impacts that will be associated with the Project's increase in vehicular use within the adjacent areas and is, therefore, inadequate.

The project claims of generating adequate business draw and employment opportunities have been inadequately defined. Statements of fact need to be substantiated with evidence. Since a developer has not been identified, the Regional University Plan does not have signed a contract to maintain and operate an additional campus along with the withdrawal of Warwick, and lack of identity, the DEIR needs to address with quantifiable evidence that the project is economically feasible since it was previously rejected in the 2007-time frame by the City of Roseville. Assertions are speculative. 41-3

The DEIR fails to quantify within the Environmentally Superior Alternative section, "HOW" the No-Project Alternative "**would result in a more severe significant biological impact associated with the loss of vernal pool habitat**". Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to the region and would be affected by the project. The DEIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context. Loss of vernal pools, farmland, etc have not been adequately described or evaluated. 41-4

The DEIR does not address Affordable housing needs adequately and needs to further clarify affordable housing goals since California has deemed availability of affordable housing to be a Statewide priority. Further explanation of how this project will meet State targets needs to be expanded. 41-5

An alternative created by the residents of Placer County, the Citizen's Initiated Smart Growth Plan (CISGP) should be included as a viable alternative since it achieves the same goals and objectives of the Sunset Area Industrial Specific plan with fewer impacts. 41-6

Respectfully
Larissa Berry

Letter 41	Larissa Berry February 21, 2019

41-1 The comment expresses concern about the number of EIRs issued by the County in the same timeframe and the length and complexity of the documents. See response to comment 32-1 regarding CEQA page limit recommendations.

41-2 The comment expresses concern regarding cumulative LOS impacts and increases in VMT. The comment asserts that the Draft EIR fails to consider cumulative traffic impacts resulting from vehicular travel in adjacent cities (Lincoln, Roseville, and Rocklin).

The Draft EIR addresses the project's impacts to traffic operations (i.e., level of service impacts to intersections and specific roadway segments) and overall vehicular use (i.e., vehicle miles traveled). This is also accounted for in the Draft EIR's air quality and greenhouse gas emissions analysis.

The Draft EIR discloses the project's cumulative traffic impacts, including the anticipated cumulative level of service, as described in Impacts 4.14-15 through 4.14-23. This includes reasonably foreseeable roadway projects that are anticipated to be completed based on the financially constrained SACOG 2036 MTP/SCS project list.

The Draft EIR cumulative traffic analysis includes trips generated by reasonably foreseeable development in Lincoln, Roseville, and Rocklin, as described on page 4.14-94. Furthermore, the traffic analysis considers the project's traffic impacts in these jurisdictions, as shown in Impacts 4.14-17 through 4.14-19. Exhibits 4.14-16, 4.14-19, and 4.14-22 show that the traffic analysis considers increases/changes in traffic volumes on roadways in Lincoln, Roseville, and Rocklin that result from the proposed project. Therefore, the analysis does address vehicular traffic changes in adjacent areas.

41-3 The comment states that the Draft EIR needs to address whether the project is feasible. The comment references the Regional University Plan. The Draft EIR was released for the SAP and PRSP, not the Regional University Plan. These are two separate projects. See responses to comments 56-6 and 56-9 regarding financial feasibility.

41-4 The comment states that the Draft EIR does not quantify how the No-Project Alternative would result in a more severe significant biological resources impact associated with loss of vernal pool habitat. This statement is excerpted from Section 6.5, "Environmentally Superior Alternative," of the Draft EIR. The complete analysis of the No-Project Alternative is provided on pages 6-10 through 6-14, with the analysis of biological resources provided on page 6-13. As described in Master Response 1: Alternatives Analysis, quantification of impacts is not required by CEQA for project alternatives. Rather, "the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison to the proposed project" (CEQA Guidelines Section 15126[d]). As to the comment about the regional setting being critical to the assessment of environmental impacts, see Section 4.4.2, "Environmental Setting," which describes the environmental setting for biological resources (including those resources that are rare or unique, as referenced in the comment). This environmental setting constitutes the baseline physical conditions by which the County determines whether an impact is significant, consistent with CEQA requirements. Mitigation is identified to reduce potentially significant and significant impacts. Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable. Thus, contrary to the commenter's assertion, the project's significant impacts are adequately analyzed and discussed, and significant impacts are considered in the full environmental context. No evidence is provided to the contrary in this comment.

Finally, the comment states that loss of vernal pools, farmland, etc. are not adequately described or evaluated. These issues are addressed in Sections 4.4, "Biological Resources," and 4.2, "Agricultural Resources," of the Draft EIR. The comment does not provide specific reasons specifying why the Draft EIR is inadequate in these analyses. Therefore, a response is not warranted.

41-5 The comment claims the Draft EIR does not address affordable housing needs adequately, and requests further explanation as to how this project is consistent with State housing regulations. See response to comment 18-2. Additionally, see Section 4.12.2 of the Draft EIR for information regarding affordable housing needs and compliance with State housing law. State housing law requires counties to prepare a Housing Element as part of its General Plan to adequately plan to meet each jurisdiction's housing needs, and Placer County complies with Sate housing regulations through the County's Housing Element.

41-6 The comment requests that the County evaluate the CISGP as an alternative to the project. As noted in Master Response 2: Citizen-Initiated Smart Growth Plan, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

From: Kathleen Crawford <kathleen@thecrawfordfamily.net>
Sent: Thursday, February 21, 2019 5:30 PM
To: Shirlee Herrington
Subject: Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

Letter 42

Dear Ms. Herrington,

AS a resident of Sun City Roseville, I have concerns about the incomplete DEIR on the Sunset Area Plan stated above. My particular concerns are in the areas of residential, transportation and environmental impacts. Living off Blue Oaks and Fiddyment and seeing the current developments being built out, this plan does not take into consideration how the proposed developments will exacerbate current growth problems. 42-1

Kathleen Crawford
4130 Sylvan Glen Lane
Roseville, CA 95747

Letter 42 Kathleen Crawford
February 21, 2019

42-1 The comment expresses the opinion that the project does not consider how the proposed developments would exacerbate current growth problems. Potential impacts of the project related to growth are evaluated in Section 4.12, "Population, Employment, and Housing," of the Draft EIR. Impact 4.12-1 evaluates the population growth from new homes and businesses associated with the project and determined that impacts would be significant, but noted that reducing development would conflict with Placer County's objectives to provide opportunities for economic innovation, offer housing diversity, improve the jobs-housing balance, catalyze development, establish a major employment center, and other objectives (see Chapter 3, "Project Description," Subsection 3.4.1, "Sunset Area Plan Objectives," and Subsection 3.4.2, "Placer Ranch Specific Plan Objectives"). Impact 4.12-3 evaluated the growth impacts of the project in association with cumulative growth in the region and concluded that while buildout of the net SAP and PRSP areas would have a modest contribution to overall regional growth, the project would have a considerable contribution to this significant cumulative impact.

February 22, 2019
To: Shirlee Herrington
From: Charlene Daniels
Subject: Sunset Area/Placer Ranch Specific Plan Draft EIR

Letter 43

Thank you for the opportunity to comment on the Sunset Area/Placer Ranch Specific Plan Draft EIR. I have the following comments that primarily focus on the Placer Ranch EIR.

Land Use

- The EIR needs to provide a more thorough discussion and provide adequate documentation as to why the one mile buffer currently required by the PCGP needs to be reduced. It seems that if the County is already receiving numerous complaints about the landfill, it indicates that the current one mile buffer is not adequate. Although the analysis cites other agencies that have a buffer less than one mile, this seems immaterial when there is clearly a problem with the existing facility.
- If the EIR has already determined that there will be a substantial increase in the number of complaints about the landfill, the proposed change to reduce the land use buffer is inconsistent with PCGP policy 4.G.11, which requires the landfill be protected from incompatible encroachment. The EIR analysis does a good job in documenting this incompatibility by recognizing that complaints will increase as the specific plan develops. Is the County proposing to eliminate the requirement that the landfill be protected from incompatible development?
- The EIR has determined that reducing the land use buffer for the landfill will result in a Significant and Unavoidable impact. The analysis recognizes that the County will be receiving an increase in complaints as a result of sensitive land uses being located so close to the landfill. Will the developer provide mitigation funds to the County and the Air Pollution Control District to offset the increased costs associated with the increased number of complaints?
- The EIR also states that the County may have to alter the manner in which the landfill operates, will the Placer Ranch property owner be required to pay for any changes in how the landfill will operate in order to reduce nuisance complaints?

43-1

Population and Housing

- Housing Element policy B-6 "Affordable units need to be provided in a timely manner …." needs to be added to the list of applicable general plan policies. The project descriptions need to explain in greater detail how this will be implemented.
- On page 4.12-12 of the EIR, it states that t*he project is generally consistent with at the applicable General Plan policies as discussed, impacts related to General Plan consistency would be less than significant.* Additional discussion of the various housing element policies is needed in the EIR and the Specific Plan to verify that this statement such as:

  - Will each small lot tentative map be required to provide the 10% affordable housing requirement. If not, how will be obligation be redistributed to ensure that the specific plans will ultimately provide the 10% requirement?

  - The Placer Ranch Specific Plan states that in-lieu fees could be used to provide affordable housing. The Specific Plan/project description needs to recognize that the County has not adopted the nexus study which would allow for in-lieu fees to be collected. Most importantly, it is not known that if the County should decide to approve an in-lieu fee amount, will the in-lieu fee sufficient to cover the full cost of constructing the required housing?

  - If all or most of the affordable housing units are provided in the High Density Residential area, would this result in a concentration of units (housing policy B-4) and would it also locate the affordable units closer to the landfill than other residential units within the specific plan?

  - The Specific plan/project description needs to clarify that the 10% affordable housing requirement will not be used to provide housing for the college students (dormitories). If the project description increases the need for affordable housing by including student housing, it should not take away from the need for affordable housing that is already generated by the specific plan itself.

43-2

Placer ranch eir comments

Letter 43	Charlene Daniels February 22, 2019

43-1 The comment expresses concern about the project's land use impacts related to the project's proximity to the landfill. See Master Response 4: Odors for a discussion regarding consistency of the project with Placer County General Plan Policy 4.G.11 and economic impacts on PCAPCD. Physical constraints related to odors and issues related to meeting project objectives are described in Master Response 2: Citizen-Initiated Smart Growth Plan. The comment does not raise issues related to the adequacy of the Draft EIR's analysis or conclusions but raises issues regarding revising General Plan policy (the physical impacts of which are evaluated in the Draft EIR).

Regarding the comment's question as to what party will pay for changes in landfill operations in response to odor complaints, in accordance with State CEQA Guidelines Section 15126.2(a), "[a]n EIR shall identify and focus on the significant effects of the proposed project on the environment." Section 15358(b) notes that "[e]ffects analyzed under CEQA must be related to a physical change." The comment regarding financial responsibility for changes in landfill operations can be considered by decisionmakers, but such an impact is outside the scope of the EIR; therefore, no revisions have been made to the Draft EIR in response to this part of the comment.

43-2 The comment suggests that Housing Element policy B-6 be added to the Draft EIR list of applicable General Plan Policies. It requests additional discussion of County Housing Policies be added to the PRSP and EIR that describes the project's affordable housing obligation in greater detail. The comment also requests information as to the timing, location, distribution of affordable units, university housing, and whether the affordable units would be concentrated near the landfill. See responses to comments 18-3 and 18-4, which address these issues.

From: Kristen Farquhar <kristen.atis@yahoo.com>
Sent: Thursday, February 21, 2019 12:22 PM
To: Shirlee Herrington
Subject: DEIR Sunset Area Industrial Project

Letter 44

Ms. Harrington
Environmental Coordinator
Placer County

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan revealed significant impacts to the environment that no amount of mitigation will make right.

I live in the Rocklin Unified District, Area 3, adjacent to Area 1, Roseville. I have witnessed first-hand bad policy in action in regards to land development, mis-management of natural resources, faulty mitigation and poor communication and representation for the environment and the people from City Council and other so-called responsible agencies. The design for I-80/SR-65 Expansion Project labeled "Phase 1" could have been better.

Please do not make the same mistakes. I implore you and the Board of Supervisors to *terminate the proposal by approving the "No Project" alternative and give us the time to make this right.* 44-1

Along with the Alliance for Environmental Leadership, I stand in support and respectfully request that you recirculate the DEIR, that the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed as a Project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives as set forth in the DEIR.

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Regards,
K. Farquhar
Rocklin, California

Letter 44 Kristen Farquhar
February 21, 2019

44-1 The comment provides an opinion regarding the merits or qualities of the project; is also directed toward the project approval process; and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

As to the request that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

From: Brett Hoffman <bhoffman07@mail.roosevelt.edu>
Sent: Wednesday, February 20, 2019 9:12 AM
To: Shirlee Herrington
Subject: Sunset Industrial Area Project - Draft EIR

Letter 45

Hello,

My Name is Brett Hoffman. I currently work in Loomis and live in Rocklin. I am obtaining my MBA in Sustainability and working full time for a Water Environmental-Remediation company. I am very invested into sustainability efforts for Placer county current residents and those to come.

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan. revealed significant impacts to the environment that cannot be mitigated. Because of the Projects egregious environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative.

If the Board determines to pursue the project, the Draft EIR must be recirculated because it fails to adequately analyze environmental impacts and is incomplete. 45-1

I respectfully request that as you recirculate the DEIR, that the **Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed as a Project alternative** because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives as set forth in the DEIR.

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Cordially,

Brett Hoffman
(916) 261 - 2136
4607 Lemon Hill Drive,
Rocklin, CA 95677

Letter 45 Brett Hoffman, February 20, 2019

45-1 This comment letter is virtually the same as the content of comment letter 23. Therefore, this response simply cross-references to responses to this letter. See response to comment 23-1.

From:	Carol Holliman <carolholliman@gmail.com>
Sent:	Friday, February 22, 2019 9:35 AM
To:	Placer County Environmental Coordination Services
Cc:	Shirlee Herrington
Subject:	Comments on Draft EIR for Sunset Area Plan/PRSP

Letter 46

February 22, 2019

Placer County Community Development Resource Agency,
Environmental Coordination Services
3091 County Center Drive #190
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator

Dear Ms. Herrington,

I am a resident of Placer County, living in Auburn. I have reviewed the County's Draft Environmental Impact Report
(DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

The DEIR Section 2, Executive Summary, Table 2-1 lists all of the significant and unavoidable impacts under "Summary of Environmental Impacts and Recommended Mitigation Measures" with their corresponding DEIR reference number. I was very concerned to observe that there are sixty impacts listed as "Significant and Unavoidable" (SU) after mitigations. My first request is that the County fully consider the implications of each of these, rather than accept each SU conclusion and continue forward. None of the DEIR alternatives adequately address the majority of these SU impacts, so new, more effective alternatives should be sought, and the DEIR revised and re-circulated in light of superior alternatives. 46-1

As a daily commuter to work in Sacramento along I-80, I am particularly alarmed by the potential impact to transportation and circulation. According to the DEIR Section 2, Executive Summary, Table 2-1, section 4.14, there are 25 listed impacts, 12 of which are Significant and Unavoidable (SU) after mitigation. There are numerous impacts which decrease the Level of Service (LOS) from an acceptable level to an unacceptable level LOS D or worse. One of the worst examples is that of the Woodcreek Oaks Boulevard / Painted Desert Drive intersection, which currently operates at LOS F during a.m. peak rush hour; it would experience an increase in delay of more than 200 seconds per vehicle (4.14-4). The Alliance for Environmental Leadership (AEL) estimates an increase in daily vehicle trips of 895,317 based on data provided in the January draft of the SAP [Consumer Initiated Smart Growth Plan, pgs 47,66-67], an incredible additional load on roads that are already struggling to handle the current VMT load. The many significant impacts to transportation and circulation described in the DEIR should be of major concern to the County and all residents the neighboring cities. 46-2

In her presentation during the February 14th, 2019 public hearing on this DEIR, Crystal Jacobsen explained that many of the traffic-related SU's were listed as SU because they were outside of the jurisdiction of the County. She also noted that the primary mitigation for these impacts was the use of a fair-use charge on developers to fund road improvements. I was under the impression that she was suggesting that the many SU's were not as serious as it appeared for this reason. I respectfully disagree. Building permits would be issued when the fee is paid, even though in many cases no existing approved plan exists to address the additional road improvements required even if funding was available. It is not appropriate to approve a development plan, or the EIR that reports on it, based on vague future expectations. As my second request, I ask that you require effective, fully funded mitigation plans before considering approval of the EIR. 46-3

1

As indicated above, the primary mitigation shown in the DEIR is that of charging the developer a fair-share impact fee to fund construction of transportation facilities and/or improvements in the affected area. The DEIR does not adequately address other measures that exist to reduce impact, and is thus not in compliance with CEQA. Other measures include the fully funded creation of light rail / Rapid Transit options, the construction of a transportation center, car sharing programs and more substantial plans for residential models where more residents live and work within a ¼ mile radius, with supporting services, such as shops, restaurants and hospitals. A much better alternative is extensively documented in the AEL's Citizen Initiated Smart Growth Plan (CISGP). My third request is that you also recirculate the DEIR after inclusion and evaluation of the CISGP alternative to allow full and thorough analysis. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. 46-3 cont.

Thank you for the opportunity to provide comments on the DEIR. I look forward to a comprehensive response from the County.

Sincerely,

Carol Holliman
5207 Morningside Ave,
Auburn, CA 95602
(530) 878-1427

Letter 46 Carol Holliman
February 22, 2019

46-1 The comment expresses concern regarding the project's significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. As described therein, CEQA specifically requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). Thus, the commenter's request that the County fully consider the implications of each significant and unavoidable impact is an explicit part of the CEQA process and, therefore, the County's project approval process.

Regarding the statement that the Draft EIR alternatives do not adequately address the project's significant and unavoidable impacts, see Master Response 1: Alternatives Analysis. Also, see Master Response 2: Citizen-Initiated Smart Growth Plan.

46-2 The comment expresses concern regarding significant traffic impacts, particularly LOS impacts, identified in the Draft EIR, and specifically cites the Woodcreek Oaks Boulevard/Painted Desert Drive intersection as an example. The Draft EIR discloses the project's impacts to traffic operations and identifies feasible mitigation measures to reduce the severity of these impacts. The example of the Woodcreek Oaks Boulevard/Painted Desert Drive intersection is addressed on page 4.14-70. As noted in the Draft EIR, traffic operations at this intersection are restored to an acceptable LOS C or better with the recently installed traffic signal.

The comment incorrectly asserts that the project would result in an increase of 895,317 daily vehicle trips. The increase in daily vehicle trips cited in the comment is overstated. Table 4.14-35 on page 4.14-106 of the Draft EIR presents the daily trip generation at buildout of the SAP. This table shows that 561,635 daily trip ends are generated at buildout of the SAP. However, some of these trip ends would remain internal to the SAP area (i.e., begin and end within the SAP area). Therefore, the number of external trips would be less.

46-3 The comment requests fully funded mitigation plans be in place before considering approval of the EIR. Development within the net SAP and PRSP areas would be required to pay traffic fees for both regional roadway impacts as planned through various joint powers agencies and other groups the County participates in to mitigate impacts to off-site roadways that are outside the County's land use authority. Also, see Master Response 9: Mitigation and Development Fees.

From: Terry Holliman <terryholliman@gmail.com>
Sent: Thursday, February 21, 2019 8:02 AM
To: Placer County Environmental Coordination Services
Subject: SAP/PRSP DEIR

Letter 47

February 20, 2019

Placer County Community Development Resource Agency,
Environmental Coordination Service
3091 County Center Drive #190
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator
(cdraecs@placer.ca.gov)

Dear Ms. Herrington

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

My comments are focused on Section 4.16 of the DEIR, specifically 4.16.3 Regulatory Setting. It begins by listing some of the applicable State rules and regulations, including the following discussion of Title 24, Part 6.:

"California's Building Energy Efficiency Standards CCR, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. Title 24 Part 6 was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy-efficiency standards for residential and nonresidential buildings. . . . . In 2016, CEC updated Title 24 standards again, effective January 1, 2017. CEC estimates that the 2016 standards are 28 percent more efficient than 2013 standards for residential construction (CEC n.d.) and are approximately 5 percent more efficient for nonresidential construction (CEC 2015).

The 2019 Title 24 Part 6 Building Energy Efficiency Standards were adopted by the CEC on May 9, 2018 and will take effect on January 1, 2020. The standards are designed to move the State closer to its zero net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the site electricity needs of each residential unit (CCR, Title 24, Part 6, Section 150.1(c)14). CEC estimates that the combination of mandatory on-site renewable energy and prescriptively required energy efficiency features will result in new residential construction that uses 53 percent less energy than the 2016 standards. Nonresidential buildings are anticipated to reduce energy consumption by 30 percent compared to the 2016 standards primarily through prescriptive requirements for high-efficacy lighting (CEC 2018). The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary in response to local climatologic, geologic, or topographic conditions, provided that these standards are demonstrated to be cost effective and exceed the energy performance required by Title 24 Part 6."

47-1

This section continues with:
"Housing Energy Conservation GOAL: To increase the efficiency of energy use in new and existing homes with a concurrent reduction in housing costs for Placer County residents.

- Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency Retrofitting of existing units shall be encouraged."

I would like to comment that the above underlined portion of Policy G-1 could be read to refer to the 2016 standard of Title 24, Part 6 since the 2019 version will not go into effect until January 1, 2020. This would subvert the gains in efficiency that new regulations require. Perhaps the sentence could be revised to state: ": The County shall require that all new buildings meet 2019 or later Title 24, Part 6 requirements for energy efficiency and encourage developers to exceed Title 24 requirements. It should be pointed out that it is unlikely that any building permit will be issued until the 2019 standard is in force.

1

In 4.16.4 Analysis, Impacts, and Mitigation the DEIR Building Energy Efficiency states: "STANDARDS OF SIGNIFICANCE Based on Appendix F (energy) of the State CEQA Guidelines, implementing the project would have a potentially significant impact on energy if it would:

- result in wasteful, ...;

- fail to incorporate feasible renewable energy or energy efficiency measures into building design, equipment uses, transportation, or other project features, or otherwise fail to increase reliance on renewable energy sources;"

By clearly requiring 2019 Title 24, Part 6 the County will minimize any controversy and improve the overall energy use by the project. This would be a very large mitigation in the modeling of energy usage and a positive for the DEIR.

47-2

Similarly, in the "PROPOSED SUNSET AREA PLAN GOALS, OBJECTIVES, AND POLICIES the SAP includes the following goals and policies related to energy consumption:"

"Housing Energy Conservation GOAL: To increase the efficiency of energy use in new and existing homes with a concurrent reduction in housing costs for Placer County residents.

- Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency and encourage developers to exceed Title 24 requirements. Retrofitting of existing units shall be encouraged."

This sentence should be revised as per the above discussion. In addition, the Policy G-1 should be continued to include a statement defining how the County will hire, and/or train, enough qualified and certified professional staff to evaluate the energy analysis, plans and documentations that are required by 2019 Title 24, Part 6. I do not believe that statements which include phrases like "the required actions (mitigations) will be implemented in the future" are acceptable as mitigation. Since the required implementation date is approximately ten months away the specific details should be available for inclusion.

Policy NR-6.7: Residential Energy Efficiency and section "IMPACTS AND MITIGATION MEASURES" should also be clarified to bring this section into agreement with 2019 Title 24, Part 6.

47-3

I would also like to echo the commentary of Pierre Delforge with the Natural Resources Defense Council in his blog of 12/5/18:

How would you like living in a home with a dramatically reduced electric bill? That will be a reality for most new homes in California starting in 2020, thanks to a new building energy code adopted today by the California Energy Commission. The updated code—the first of its kind in the nation—will combine rooftop solar panels with enough energy efficiency measures like insulation and better windows that all new single-family homes and low-rise apartments will use net-zero electricity. This means that their solar array should offset all electricity use for cooling, plug-in equipment, and lighting on an annual basis.

The groundbreaking decision to make these new homes net-zero electricity, coupled with major savings from more efficient lighting required by the updated code for commercial buildings, will save Californians more than $1.7 billion in net energy savings over the next 30 years and reduce carbon pollution statewide by 1.4 million metric tons. This is equivalent to the emissions from the annual electricity use of all households in the city of San Francisco.

47-4

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

47-5

Sincerely,

Terence Holliman
5207 Morningside Ave.
Auburn, CA 95602
530 -878-1427

Letter 47	Terence Holliman February 20, 2019

47-1 The comment addresses the possible interpretation of Policy G-1 of the Housing Element in the Placer County General Plan to suggest that all new buildings in the county would be built to the 2016 California Energy Code. Rather, the General Plan policy ensures compliance with the building standards in effect at the time of construction. All project buildings (and all new construction in the county) would be required to comply with the version of the California Energy Code in effect at time of construction, which could be the 2019 standards, or a later iteration. All development in the county is required to comply with the California Energy Code. No revisions are necessary to the Draft EIR.

47-2 The comment suggests that the 2019 Energy Code be required for the project. See response to comment 29-1.

47-3 The comment suggests that Policy G-1 be clarified. See response to comment 47-1. Regarding the issue raised number of County staff needed to enforce 2019 Title 24, Part 6, the County's staffing levels in response to the updates to the California Energy Code will not be affected by whether the proposed project is approved. Also, this is not an environmental issue and no further response is required.

47-4 The comment describes perceived benefits of the 2019 California Energy Code standards. No specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted.

47-5 The comment suggests that the County evaluate the CISGP as an alternative to the project. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

From: Glen Holstein <holstein@cal.net>
Sent: Tuesday, February 12, 2019 1:25 PM
To: Shirlee Herrington
Cc: 'Leslie Warren'
Subject: Spadefoots in Sunset Area Plan/Placer Ranch Specific Plan

Letter 48

Dear Placer County,

It is come to my attention that no surveys for western spadefoots (*Spea hammondii*) have been done in the areas of the Sunset Area Plan/Placer Ranch Specific Plan because there are no records of this special status species there. I can confirm, however, that I found a population of this species in an ephemeral streambed there while conducting environmental surveys. Consequently focused surveys for this species should be done in these areas before any EIR can be considered complete.
My surveys also found approximately one thousand individuals of tricolored blackbird (*Agelaius tricolor*), another special status species, foraging in and around the landfill in the area of the plans. 48-1

Dr. Glen Holstein
Consulting Environmental Scientist

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This message has been scanned for viruses and dangerous content by MailScanner, and is believed to be clean.

Letter 48 | Dr. Glen Holstein, Consulting Environmental Scientist
February 12, 2019

48-1 The commenter states he personally identified a population of western spadefoot in an ephemeral streambed in the SAP area and approximately 1,000 tricolored blackbirds foraging around the landfill.

The Draft EIR acknowledges that western spadefoot may occur in the SAP area, analyzes potential impacts to this species (Impact 4.4-3), and proposes mitigation, including conducting surveys in suitable habitat, minimizing take (Mitigation Measure 4.4-3a), and compensation for habitat loss (Mitigation Measure 4.4-3b).

The Draft EIR acknowledges that tricolored blackbird may occur in the SAP area, analyzes potential impacts to this species (Impact 4.4-5, page 4.4-53), and proposes mitigation, including conducting surveys in suitable habitat, minimizing disturbance, and compensation for habitat loss (Mitigation Measure 4.4-5a).

Chair and Members of the Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Attn: Shirlee Herrington,
Environmental Coordinator

Arlene Jamar
4645 Arrowhead Drive
Rocklin, CA 95677
February 21, 2019

Letter 49

Ms. Herrington, Chairperson and Members of the Placer County Planning Commission,

I have reviewed the Placer County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Industrial Area Project and Placer Ranch Specific Plan. I have a few comments and concerns that must be addressed by the County.

The Draft EIR for the now-combined projects reveals significant impacts to the environment that cannot be mitigated. Because of the Projects' egregious environmental impacts, the Board of Supervisors should terminate the project proposal by approving the "No Project" alternative. One omission that must be addressed in the DEIR is the process, and by whom, municipal services will be provided the area in collaboration with Roseville City. How will the necessary services and collaboration occur? 49-1

If the Board determines to pursue the project, the Draft EIR must be recirculated because it fails to adequately analyze environmental impacts and is incomplete.

In addition to my comments, the Alliance for Environmental Leadership group submitted Alternative 6 to the DEIR. This Alternative meets all of the County's Objectives and would be environmentally superior to the proposed Project and the other Alternatives included in the DEIR.

I request that, as you recirculate the DEIR, AEL's Citizen Initiated Smart Growth Plan be analyzed as a Project alternative. 49-2

Thank you for the opportunity to provide comments on the DEIR. I urge Commission members to thoroughly study and consider all communication relative to this DEIR. The impact of irresponsibly developing these 8,497 acres is huge and the results will be detrimental to all surrounding areas.

Sincerely,

A. Jamar

Arlene Jamar

Letter 49	Arlene Jamar February 21, 2019

49-1 The comment is directed toward the project approval process and does not raise issues related to the adequacy of the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

The comment also asks about the process by which municipal services would be provided to the project in collaboration with the City of Roseville. Chapter 3, "Project Description," of the Draft EIR, describes the proposed utilities for the SAP on pages 3-26 and 3-27, and proposed utilities for the PRSP on pages 3-51 through 3-62 (other supporting infrastructure, including municipal services, located outside of the net SAP and PRSP areas are described in Section 3.6). Public utilities in the project area are provided by various entities, as identified in Table 4.15-1 and discussed in detail in Section 4.15, "Utilities," of the Draft EIR.

49-2 The comment requests that the County evaluate the CISGP as an alternative to the project. As noted in Master Response 2: Citizen-Initiated Smart Growth Plan, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

From: hollyjesq@aol.com
Sent: Monday, January 14, 2019 11:09 AM
To: Placer County Environmental Coordination Services
Cc: Christopher Schmidt
Subject: Re: Whitehawk I and II - Draft EIR - ADDITIONALLY Placer Retirement Residence Draft EIR and Cumulative Projects

Letter 50

Thank you.

It should also be noted that there are several draft EIRs that have been released recently by Placer County, whereby individually and cumulatively they are exceeding the page limitation and the burden placed on the public to adequately respond, which is not reasonable. Request is hereby made for the extension of time to respond to these projects and proposed revisions. My understanding is that the documents and projects proposed include, but are not limited to, Whitehawk I and II; Sunset Area Plan; Placer Retirement Residence draft EIR; Tiny Houses proposed amendments to the Placer County Code; Placer Ranch; Sunset Industrial Area/Placer Ranch draft EIR; and proposed Zoning Text Amendments to the Placer County Code.

Further, the Placer Retirement Residence draft EIR exceeds the page limitation set forth in regulation under CEQA. The offices associated with licensing and the facilities are closed due to the shutdown. Impacts for the Sunset Industrial Area/Placer Ranch project are far reaching and of significant impact on the entire county. The project will destroy thousands of acres of farmlands, wetlands, endangered species and add to traffic corridors with 10,000 additional homes without providing adequate affordable housing. Information from departments involved in affordable housing and destruction of endangered species are closed due to the federal government shutdown and, as a result, the public is denied access at this time to critical information that would allow pertinent statements.

It is respectfully submitted that there be an extension of time to respond to these projects. Please allow the public to adequately respond to the numerous projects and voluminous documents set forth by Placer County, and for the County to comply with federal and state mandates.

50-1

Thank you,
Holly Johnson

-----Original Message-----
From: Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
To: Holly <hollyjesq@aol.com>
Cc: Christopher Schmidt <CRSchmid@placer.ca.gov>
Sent: Mon, Jan 14, 2019 10:24 am
Subject: RE: Whitehawk I and II - Draft EIR

Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. Also, you are on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities to for public participation and input.

.....
Thanks.

Shirlee Herrington
Community Development Technician
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190, Auburn, CA 95603
530-745-3132 fax 530-745-3080

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-----Original Message-----
From: Holly [mailto:hollyjesq@aol.com]
Sent: Saturday, January 12, 2019 8:20 PM
To: Placer County Environmental Coordination Services
Cc: Christopher Schmidt
Subject: Re: Whitehawk I and II - Draft EIR

Correction: Title 14 CCR reference should be to section 15141.

> On Jan 12, 2019, at 8:17 PM, Holly <hollyjesq@aol.com> wrote:
>
>
> To Whom It May Concern:

> Title 14 of the California Code of Regulations section 151410 provides that the draft EIR should be only 150 pages, with those of unusual scope to be less than 300 pages. The draft EIR for the Whitehawk proposals is 747 pages, plus the 1;638 pages in the appendices for a total of 2,385 pages. Placer County further released this EiR for public comment over the holidays, with no extension in the time period to respond.

> Placer County is in violation of the page requirements for the draft EIR pursuant to the California Code of Regulations. Request is hereby made to (1) ensure the Draft EIR complies with the page limitations; and (2) provide for further extension of time for the public to adequately respond.

> Furthermore, there is no adequate justification to approve the increase in density for these projects or to alllow zoning modifications to authorize same. There is no adequate mitigation to the increase in traffic and congestion, and to already high level of services, or that which would adequately address the destruction in the nature and beauty of that area on Douglas Boulevard.

50-2

> Thank you in advance for your consideration.

> Holly Johnson

Letter 50	Holly Johnson January 12 and 14, 2019

50-1 The comment expresses concern about the number of EIRs issued by the County in the same timeframe and the length and complexity of the documents. See response to comment 11-1 regarding the government shutdown and the public's ability to provide comments. See response to comment 32-1 regarding CEQA requirements for public review periods, CEQA page limit recommendations, and requests for extension of the comment period.

50-2 A portion of the comment (including the subject line) references the Whitehawk I and II Projects in Granite Bay, for which the County issued a Draft EIR in November 2018 and a Final EIR in February 2019. These projects are not associated with the SAP/PRSP or EIR. Nonetheless, see response to comment 32-1 regarding CEQA page limit recommendations and requests for extension of the comment period.

February 14, 2019

Letter 51

Comments to the Placer County Planning Commission public hearing for the
Draft Environmental Impact Report for the Sunset Area Plan and Placer Ranch Specific plan

Chair and Members of the
Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603

Attn: Shirlee Herrington, Environmental Coordinator
sherring@placer.ca.gov

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the Proposed Sunset Area Plan and the Placer Ranch Specific Plan and I have questions, comments and concerns that I respectfully request be addressed by the County:

The table 2-1 of the Executive Summary lists 57 Significant but Unavoidable environmental impacts that would result from implementing the SAP. Some of these impacts are unavoidable because they occur outside the jurisdiction of Placer County, like the expansion of the Pleasant Grove Retention Facility in the City of Roseville. The environmental document for the expansion of this facility to accommodate the storm water from the SAP has not been created. Yet the SAP relies entirely on this expansion. I question whether it is even legal for Placer County to proceed with the SAP process under this tenuous situation. There is no guarantee that there will be anyplace for the storm water runoff from the SAP to go. 51-1

Section 3.4 of the Project Description contains the Goal and Objectives of both the SAP and the PRSP. But the SAP and PRSP are in conflict with these goals in many areas and my written comments will address a number of these conflicts but here are couple. One goal of the PRSP is to Foster Sustainable Community Design by aiding the County in achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat storm-water, and reduce reliance on the automobile. However the project design does not meet these goals. The Citizen Initiated Smart Growth Plan which is being provided to you as an alternative to the SAP does go much further in every one of the above listed long-term sustainability goals. I think it would be prudent of you to recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. Another goal of the PRSP is to Enable Blueprint Consistency: Create a development plan that is consistent with the growth principles identified in the Sacramento Area Council of Government's Blueprint, which consists of providing high-density residential neighborhoods; more compact forms of development; alternative transportation options, such as Bus Rapid Transit and bicycle use; and an interconnected network of residential neighborhoods, commercial nodes, and employment centers. The SAP and PRSP fail to meet the SACG blueprint and fails to provide Bus Rapid Transit compliant development. The CISGP does comply with the SACG blueprint and is Bus Rapid Transit compliant. 51-2

Scott Johnson 15215 Bancroft Road Auburn CA 95602 530-878-1566 scottj@johnsonpianoservice.com

Scott Johnson

Letter 51	Scott Johnson February 14, 2019

51-1 The comment notes that implementing the project would result in significant and unavoidable impacts, some of which would be unavoidable because they would occur outside of the County's jurisdiction. These impacts are listed in Table 2-1 of the Executive Summary and in Section 5.1, "Significant and Unavoidable Impacts," the latter of which also includes the statement regarding jurisdiction. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

The comment also suggests that the project is completely dependent on the Pleasant Grove Retention Facility. This is not correct. The Draft EIR states (page 3-26) that development in the SAP area would require stormwater volumetric retention as a means to minimize increased stormwater volumes that would otherwise reach the Sacramento River and that volumetric retention could be either on site or off site; however, off-site facilities on a regional scale would be more practical for the SAP, and several have already undergone some level of planning and design. Page 3-58 of the Draft EIR (as revised by this Final EIR; see Chapter 2, "Revisions to the Draft EIR") provides even further clarity indicating that retention is proposed to occur either on-site, in the existing City of Lincoln Lakeview Farms retention basin, or in a proposed retention basin that could be constructed on the Scilacci Farms property, for which the County has secured an easement, which allows for flood control. Therefore, several retention options are identified, including on-site retention. The project is not dependent on implementation of the Pleasant Grove Retention Facility.

51-2 The comment states that the SAP and PRSP conflict with the goals and objectives provided in the Draft EIR, including long-term sustainability and consistency with the Sacramento Area Council of Government's Blueprint. This is a summary of the detailed comments provided by the commenter in comment letter 52, below. See responses to the detailed comments in comment letter 52, below.

As to the request that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
Environmental Coordination Services
February 19, 2019
Page 1

Letter 52

Scott Johnson
15215 Bancroft Road Auburn, CA 95602
530-878-1566
scottj@johnsonpianoservice.com

Via Email and U.S. Mail or hand delivery

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
cdraecs@placer.ca.gov
sherring@placer.ca.gov

Re: Comments on the Draft Environmental Impact Report for the Sunset Area Plan and Placer Ranch Specific Plan

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the Proposed Sunset Area Plan and the Placer Ranch Specific Plan and I have questions, comments and concerns that I respectfully request be addressed by the County.

The County's Draft Environmental Analysis for the proposed Sunset Industrial Area found 57 significant and unavoidable impacts, many of which occur onsite, that could not be mitigated if the project were implemented. These will affect the health and well being of people and the environment today and impact future generations. Examples:

- Unavoidable impact: Green house gas emission exceeding 575,000 metric tons per year - a volume so great that it is projected to have global impacts
- Unavoidable impact: Loss and degradation of State and Federally protected waters
- Unavoidable impact: Increased automobile usage exceeding 870,000 daily vehicular trips that will result in declines of levels of service, roadway operations and intersection function on major regional roadways in the County and in the Cities of Roseville and Rocklin
- Unavoidable impact: increased stormwater runoff and increased potential for downstream flooding
- Unavoidable impact: Substantial soil erosion
- Unavoidable impact: Interfere substantially with wildlife movement and conflict with local policies and ordinances protecting biological resources
- Unavoidable impact: Create objectionable odors affecting a substantial number of people

52-1

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
Environmental Coordination Services
February 19, 2019
Page 2

All of the above examples of impacts could be substantially mitigated by adoption of the Alliance for Environmental Leadership Citizen Initiated Smart Growth Plan as the environmentally superior alternative. Why should the County not recirculate the DEIR to allow a full and thorough analysis of the AEL's CISGP? 52-1 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.1-4: New source of substantial light or glare that would adversely affect day or nighttime views in the area after build out No mitigation is available. Significant and unavoidable Impacts
This impact is listed as "no mitigation is available." I disagree with the DEIR assertion that no mitigation's are available. I refer you to the work of the Dark Sky group and their recommendations for lighting when building new construction. The organization estimates that 30 percent of outdoor lighting in the U.S. is wasted, amounting to $3.3 billion and 21 million tons of carbon dioxide emissions per year. Here is a link to an article with case studies.
https://www.architecturalrecord.com/articles/11814-continuing-education-dark-sky-design
Why would Placer County not use every available mitigation and the technologies and policies that are readily available to protect our views of the night sky? The DEIR consultant failed to analyze the importance of our night sky to wildlife (migration) and hunting. The consultant also failed to reference medical research about the importants of our night skies to the health and well being of citizens (sleep and quality of life.) Nor did the consultant analyze how high quality views of the night sky will be an attraction for Placer County as a tourist destination and a place to relocate your home to, or locate new jobs and businesses. To what degree will the light pollution generated from the SPA and PRSP site impede enjoyment of the night sky, and why are available measures available to protect the night sky for wildlife and human and economic benefit not listed under mitigatations? I believe this section is inadequate because the economic, wildlife and social values of the night sky were not quantified so that these "benefits" could be compared to any projected "costs" of mitigation. 52-2
Just because these guidelines have not been followed in surrounding communities is no excuse for building more structures with non-dark sky compliant outdoor lighting. In the future as buildings in surrounding communities have their outdoor lighting retrofitted with more energy efficient lighting, they should also be brought into dark sky compliance by county statute. What is light pollution? Mark Major, principal of London-based lighting design firm Speirs + Major, explains simply that since illumination is a byproduct of energy, if you are using more than is required, or you are putting it where it isn't desired or necessary, "by definition, that is pollution." The DEIR should quantify this pollution and the costs associated with it. Light trespass, the term for light cast where it is not wanted or needed, such as illumination from a streetlight cast into a bedroom, making it difficult to sleep is a form of light pollution which can cause harm but which can be mitigated by downward facing lighting.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.3-3: Long-term operational emissions of criteria air pollutants and ozone precursors Significant and unavoidable Impacts
The recommendations of the CISGP (Citizen Initiated Smart Growth Plan) for the Sunset Area would reduce the impacts of the long-term emissions. (See page 47, 64 & 65) The more compact development footprint and transit compatible planning of the CISGP will reduce car trips and encourage pedestrian and bike trips as well as (BRT) Bus Rapid Transit usage. (See page 122-125 of the CISGP) The CISGP 52-3

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
Environmental Coordination Services
February 19, 2019
Page 3

replaces the 517 acre regional shopping center with an attraction center that is the same as in the SAP Entertainment and Mixed-Use District, but the Regional Shopping Center and Cornerstone District have been removed. By removing this component of the SAP, the CISGP maintains retail revenue for Lincoln, Roseville and Rocklin and will also reduce car trips. The inclusion in the Sunset Plan of a mall that is larger than the Galleria and Fountains and their surrounding retail areas combined is a holdover from earlier plans and is not relevant to the trends of today's shopping public which includes more online purchases and a preference for local business that keeps retail profits in local banks where it can be used to loan to other local businesses and homeowners instead of sending it to corporate headquarters in other states or countries.

52-3 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.3-6: Create objectionable odors affecting a substantial number of people. Significant and unavoidable Impacts. Impact 4.15-11: Potential impact on Western Regional Sanitary Landfill from incompatible land use that results in insufficient permitted capacity to serve waste disposal needs Less than significant
The DEIR is wrong here in every way. It is simply willful ignorance for the DEIR to assert that. "It is possible, but not likely, that such pressure could result in the need for WPWMA to modify WRSL operations, including possible diversion of waste to other facilities. Additionally, complaints related to the landfill and co-located operations could cause opposition to future expansion plans, and could jeopardize approval of the expansion. However, these are unlikely scenarios. WPWMA and its member agencies have a substantial investment in the WRSL and MRF, which are benefits to the region; WPWMA is planning nearterm facility improvements; WPWMA remains actively engaged with the community and stakeholders about nuisance odor issues; and WPWMA continues to be proactive about implementing odor control measures, including pilot studies to investigate the feasibility of specific technologies. For these reasons, it would be speculative to conclude that public pressure would mount to such a degree to cause something as severe as diversion of waste to other facilities, landfill closure, or denial of expansion plans. Importantly, the results of research into similar facilities indicate that landfills that are the subject of odor complaints have been allowed to expand. For these reasons, this impact would be less than significant." On the contrary I think it is speculative on the part of the DEIR to conclude that public pressure would NOT mount to such a degree to cause something as severe as diversion of waste to other facilities, landfill closure or denial of expansion plans. The DEIR does not reference what research they are citing into similar facilities so we don't know if these are similar situations. The odor impacts will be even greater than expected because the SAP does not take into account the requirement to compost 100% of food waste beginning January 1, 2020 which the WRSL (Western Regional Sanitary Landfill) will need to be in compliance with. Once the WRSL comes into compliance the odor impact will be even greater. The recommendations of the CISGP (Citizen Initiated Smart Growth Plan) (see page 24) would reduce the odor impacts by maintaining the landfill buffer zone from the WRSL for residential units and schools. Placer Ranch seeks a variance to the buffer to put 5,827 homes, an elementary school, a middle school, and a university within the mile buffer. This reduction of the buffer zone is not mitigated by disclosure agreements during property sales as alleged by the SAP and PRSP and these disclosure agreements do not prevent class action law suits that could threaten the continued use of the landfill. Closure of the landfill would impact all the ratepayers of western Placer county negatively. Protection of the rail line into the SAP is important because the landfill will be closing in 40 years and all waste will need to be put on trains and

52-4

moved to Nevada. The WRSL has been looking at expansion for the past 4 years and will be starting to work on the environmental documents for this expansion in the next year. Changes to the buffer zone will jeopardize the ability of the WRSL to undergo this necessary expansion and this impact has not been addressed in the SAP and PRSP DEIR. The effects of odor from the landfill on humans has not been quantified or given adequate consideration. These effects can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache.) With the number of odor complaints already being filed with the county from outside the SAP and PRSP area (In January 2018, WPWMA received 109 odor complaints) it is irresponsible of the DEIR to propose a reduction in the buffer zone. The increase and subsequent drop off of odor complaints coincides with the increased awareness of WPWMA's online odor reporting tool, and that odors potentially attributable to the WRSL were likely related to landfill gas (WPWMA 2018c). Odor notifications since that time have decreased, and WPWMA staff indicated they receive about two to five notifications per week. This slight decrease of complaints may be the result of weather patterns or resignation and frustration by those people affected rather than an actual reduction in odors.

52-4 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Cumulative Impact 4.3-8: Long-term operational emissions of criteria air pollutants and precursors
Significant and unavoidable Impacts
Placer County is a non-attainment area for criteria air pollutants and precursors. This document OPERATIONAL CRITERIA AIR POLLUTANT AND PRECURSOR EMISSIONS states that "If operational emissions will result in a significant impact, lead agencies shall implement all feasible mitigation to reduce the impact." By saying that there is "No Mitigation Available" the SAP throws up its hands and admits defeat. On the other hand the CISGP (Citizen Initiated Smart Growth Plan) (see page 64 & 65) does reduce contributors to criteria air pollutants and precursors by reducing motor vehicle trips generated by the particular land uses (i.e., vehicles arriving and leaving the project site), including those by residents, shoppers, workers, and vendors.) The CISGP (see page 37) does this in part by replacement of the 517 acre regional shopping center with an attraction center that is the same as in the SAP Entertainment and Mixed-Use District, but the Regional Shopping Center and Cornerstone District have been removed. By removing this component of the SAP, the CISGP maintains retail revenue for Lincoln, Roseville and Rocklin. It will also reduce car trips thereby mitigating some of the long-term operational emissions of criteria air pollutants and precursors. The more compact development footprint and transit compatible planning of the CISGP will reduce car trips and encourage pedestrian and bike trips as well as meeting the needed density to be (BRT) Bus Rapid Transit compatible. Being BRT compatible (See page 122-125 of the CISGP) is important as the Capitol Corridor commuter train builds the third rail project (now funded) bringing 10 more commuter trains to Placer County per day. The BRT is needed to provide connections to these new trains. View the third main rail project plans here. See chart on page 10 https://images.capitolcorridor.org/wp-content/uploads/2019/01/CCJPABizPlanFY1920_PublicDraft.pdf

52-5

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
Environmental Coordination Services
February 19, 2019
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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-1: Loss and degradation of state or federally protected waters Significant and unavoidable Impacts
The CISGP (Citizen Initiated Smart Growth Plan) embraces the wider setbacks from streams that are recommended by the Placer County Zoning Ordinance and those setbacks will reduce the degradation of state or federally protected waters from what they would be under the SAP. Changes in the land use planning of the CISGP (see page 31) will allow streams to meander as explained on pages 90, 91 & shown on page 121 of the CISGP. Protection of the Auburn Ravine watershed by increasing buffers on the SAP site is important in the ongoing efforts, in which I am personally involved, to restore and protect the endangered Central Valley Steelhead and the species of concern Fall Run Chinook Salmon that both populate Auburn Ravine. See pages 72 & 73 of the CISGP to quantify the Important Riparian Buffers acres protection provided in the CISGP vs. the SAP. Because of a long history of grazing on the SAP site there is a need for stream bank restoration. Trees and bushes need to be planted along these stream banks to stabilize them and restore damage done by grazing. The DEIR does not give adequate attention to this need for stream bank restoration. 52-6

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-3: Loss of federally listed vernal pool branchiopods and western spadefoot. Significant and unavoidable Impacts
The most significant ecological factor on site are the vernal pools. The Report of Science Advisers (County of Placer Natural Community Conservation Plan Habitat Conservation Plan, Report of the Science Advisers, Phase 1." Burssard, P. et al. January 8, 2004.) states that, "In Placer County, urbanization, industrial development, and infrastructure construction have resulted in substantial losses of vernal pool ecosystems. The creation of new vernal pools in mitigation banks is of marginal long-term conservation value at best. Rather, effective conservation must focus on the protection of archipelagos of pools containing a number of pools and pool types plus a substantial portion of the surrounding catchment area." See page 24 of the CISGP (Citizen Initiated Smart Growth Plan) for figures on the historical loss of vernal pools in Placer County. The SAP contains 17% of the remaining vernal pool habitat in Placer County and also the largest continual vernal pool complex. Conservation Management in the SAP referenced from the report of the Science Advisers cited above appear on page 114 of the CISGP and these conservation measures should be followed on the SAP. The SAP university land is donated by the developer and landowner of Placer Ranch, Eli Broad. The university site is a subdivision of a larger parcel with the an assessed market value of approximately $20 million. All 300 acres are a vernal pool complex. Mitigated through the PCCP, the total land conversion and special habitat fees are upwards of $40 million. By moving the university site to a different location within the SAP the CISGP (Citizen Initiated Smart Growth Plan) forestalls the impacts that the The Natural Resources Conservation Service identifies when it explains that all the main soil types have properties that severely limit their abilities to support buildings. Fiddyment soil is the most accommodating soil, providing only moderate limitations for shallow excavation. The limitations for the other types are either related to water or the shallowness of bedrock/cemented clay pan. These limitations for construction are the features that enable and sustain the vernal pool landscape. To prepare the soil for construction, it is likely that the soil will be scraped deeply and compacted with lime or other stabilizers to manufacture the desired structural properties. This will 52-7

require specialty equipment. To eliminate complexity, entire parcels will be compacted and shaped by deeply cut roads, drains and overflow ponds. Such soil preparation is irreversible. The SAP does not do enough to fit new encroaching land uses around the vernal pool landscape but instead allows the superimposing of developer desired land uses onto the valuable and biodiverse vernal pool landscapes. 52-7 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-4: Loss of valley elderberry longhorn beetle Significant and unavoidable
I have observed that the planting of elderberry shrubs as mitigation for removal during construction on, for instance, the Winchester Estates property near my home, are subject to a very poor survival rate due to a lack of follow-up by the Placer County Community Development Department to ascertain if the mitigation has been effective. The elderberry is not only a host to the endangered valley elderberry longhorn beetle but is an important habitat developer, as the name implies. Elderberry also provides abundant food for native bird species. It is also a cultural artifact for the local Native American families who collect the stems for sacred musical instruments including flutes and percussion instruments. The berries are also collected as sacred medicine and eaten or processed into food. I question if the EIR consultant did an adequate biological survey to ascertain if elderberry exists on the site. I don't see where it is stated that this plant was found in the SAP or that any survey was ever conducted. In the PRSP area reconnaissance surveys were conducted in 2005 and 2017 that did not find elderberry. In section 4.4-4 of the Biological Resources section of the DEIR under Methods for Documenting Existing Biological Conditions, I see that no survey was done of biological resources in the SAP for the purpose of this DEIR. It is my belief that the document cannot be considered valid without a biological survey being done. Due to long time grazing of much of this site there is a need for stream bank restoration. Although I have observed mature elderberry bushes withstanding grazing for a few years, they are impacted, and because they are such an important species they should be part of any restoration program once grazing has stopped. 52-8

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-5: Disturbance or loss of special-status reptile, bird, mammal, and fish species Significant and unavoidable
The improvement of the CISGP (Citizen Initiated Smart Growth Plan) over the SAP in preserving riparian corridors and native grasslands will help preserve some of the species displaced by construction on the site. Preservation of native oaks and other measures found on page 100 of the GISGP should also be implemented as part of any plan for this area. Because no biological survey was done in preparation for the DEIR there may be a misplaced emphasis on preservation of native oaks. How many oaks to be preserved do occur on this portion of the western Placer prairie? We don't know because the DEIR does not contain that information. It should contain information on how many oaks are on the site and how many would be destroyed in order to implement the SAP and PRSP. So I strongly question if the DEIR is an adequate environmental document. The DEIR must tell you what you are losing and what the cost of mitigating that loss will be in order to make good land use choices in planning. Otherwise the plan is just letting land speculators drive development instead of following the goals and objectives of the plan area. Any urban or suburban development will change the mix of species that thrive in rural environments to a mix that is more compatible with the new land uses. This is why more compact development adjacent to larger open space areas is a better way to mitigate species loss than the suburban sprawl that the SAP and PRSP cause with their emphasis on single family homes built on former wet lands. 52-9

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-6: Loss or degradation of riparian habitat Significant and unavoidable
The SAP mitigation relies too heavily on payment of mitigation fees to a CDFW-approved mitigation bank or participation in the PCCP if it is approved. Some of these types of mitigation will be required, but by increasing the buffers to riparian habitat as the CISGP (Citizen Initiated Smart Growth Plan) does (see pages 72 & 73), more of the on-site riparian habitat can be preserved. Because of the exceptional high value riparian areas on the site, this increased buffering should be required. Changes in land use under the CISGP will also reduce loss and degradation of riparian habitats. This is especially true on the Placer Ranch property where, instead of single family housing and a University District as the SAP envisions, the CISGP calls for an Innovation Campus District wrapping around the The Urban Recreation network. (See page 31, 48 & 49 of CISGP.) Because of the history of grazing on the SAP it will be necessary to do planting of native shrubs and trees that were lost during the years of grazing. The DEIR fails to address this need and this failure will have a negative impact on riparian habitats. 52-10

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-7: Conflict with local policies or ordinances protecting biological resources Significant and unavoidable impact
The changes in land use planning for the SAP and PRSP mapped out in the CISGP (Citizen Initiated Smart Growth Plan) (see page 31) reduce the conflicts with local policies and damage to biological resources. The moving of the University off the Placer Ranch property and replacement of single family homes in the Placer Ranch area with the Innovation Campus District allows more flexibility in planning and minimizes the conflicts and damage. The Innovation Campus District wraps around the The Urban Recreation network which is the focal point and primary pedestrian thoroughfare providing opportunities for a spectrum of outdoor uses from urban lawn to riparian walks and programmable edges. It provides the 'walk in the woods' design requirement called for in modern planning. For instance rather than needing to mitigate tree loss with off site plantings because single family housing and the University district were superimposed onto sensitive biological resource areas of the Placer Ranch property, the CISGP allows for retention of more of those trees with the Innovation Campus District wrapping around the Urban Recreation network. (see page 48 & 49 of CISGP) Retention of mature trees along riparian corridors will also reduce special-status species loss. The mitigation measures proposed in the SAP only address tree loss instead of how to avoid tree loss with better land use planning. That said, the DEIR may be putting a misplaced emphasis on preservation of native oaks. How many oaks to be preserved do occur on this portion of the western Placer prairie? We don't know because the DEIR does not contain that information. It should contain information on how many oaks are on the site and how many would be destroyed in order to implement the SAP and PRSP. So I strongly question if the DEIR is an adequate environmental document. The DEIR must tell you what you are losing and what the cost of mitigating that loss will be in order to make good land use choices in planning. Otherwise the plan is just letting land speculators drive development instead of following the goals and objectives of the plan area. There is no mention of how to mitigate for loss of special-status plants and animals, wetland and riparian habitats, vernal pool complexes, streams and stream zones, and large, un-fragmented areas of natural habitat, even though plan implementation would result in removal and/or degradation of these resources and would conflict with 52-11

local ordinances and policies. The proposed mitigation measures are clearly inadequate. Section 3.4 of the Project Description contains the Goal and Objectives of both the SAP and the PRSP. But the SAP and PRSP are in conflict with these goals in many areas. One goal of the PRSP is to Foster Sustainable Community Design by aiding the County in achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat storm-water, and reduce reliance on the automobile. However, the project design does not meet these goals. The Citizen Initiated Smart Growth Plan which is being provided to you as an alternative to the SAP does go much further in meeting every one of the above listed long-term sustainability goals. I think it would be prudent and I request that the county recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative. Another goal of the PRSP is to Enable Blueprint Consistency: Create a development plan that is consistent with the growth principles identified in the Sacramento Area Council of Government's Blueprint, which consists of providing high-density residential neighborhoods; more compact forms of development; alternative transportation options, such as Bus Rapid Transit and bicycle use; and an interconnected network of residential neighborhoods, commercial nodes, and employment centers. The SAP and PRSP fail to meet the SACOG Blueprint and fails to provide Bus Rapid Transit compliant development. The CISGP does comply with the SACOG Blueprint and is Bus Rapid Transit compliant. Moving the senior housing closer to the urban core as the CISGP does will better meet the SACOG and DEIR objective of providing an interconnected network of residential neighborhoods, commercial nodes, and employment centers.

52-11 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.4-8: Interfere substantially with wildlife movement Significant and unavoidable
The California Essential Habitat Connectivity Maps on page 110 & 110 of the CISGP (Citizen Initiated Smart Growth Plan) shows the farmland to the west of the SA as a major migration corridor. Various fauna use this corridor to move between the grasslands and the high Sierras. At Roseville the habitat corridor is cut off. It may be surmised from the zoomed out map that it once connected with a corridor in Davis or a corridor southeast of Interstate 80. Pages 98,99 &100 of the CISGP address the changes that development of the SAP will make to Species Displacement & Migration along with some recommendations of how to best minimize these inevitable changes. Changes proposed to land use in the CISGP will help to preserve more of the food and shelter plants that support wildlife more effectively than the SAP zoning would have done. For this reason the County should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
4.7-2: Operational greenhouse gas emissions Significant and unavoidable impact
In light of U.S. government and International scientific reports released in 2018 that give humankind 12 years to stop an irreversible catastrophic climate crisis caused by CO2 and other GHG (Green House Gas) emissions, it is important that the CISGP (Citizen Initiated Smart Growth Plan) (see page 66, 67 & 69) does reduce the levels of GHG below the estimates for the SAP and PRSP found in the DEIR. The CISGP reduces GHG levels in 12 of 12 categories including Annual passenger vehicle emissions; Annual building energy emissions; Annual water-energy emissions; Annual passenger vehicle emissions per household; Annual building energy emissions per household; Annual water-energy emissions per household; Annual NOx emissions; Annual PM10 emissions; Annual PM2.5 emissions; Annual SOx emissions; Annual CO emissions; Annual ROG/VOC emissions, and reduces overall GHG emissions by 2139 million metric tons per year. The chart on page 69 of the CISGP show the comparison between carbon storage in the CISGP and the SAP both in the Net Change in Carbon Stock Measured and as Equivalent Passenger Vehicles Driven per Year. The SAP reduces the carbon stock by 8,605 million tons more than the CISGP reduces the same carbon stock. In terms of passenger vehicles driven per year the CISGP carbon retention equals a reduction of 6755 passenger vehicles driven per year compared to the SAP. Because of this, the county must recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative. The DEIR uses an 80 year build out DEIR 3-27, but states that, "the amount of land development associated with the EMU district is speculative, given the absence of a specific project proposed in this district. However, local economic development representatives and land owners, and market factors suggest the SAP may be a potential location for a major destination entertainment or retail project." The DEIR does not provide any detailed information about who these economic development representatives and land owners are, or what they suggested exactly, or what the market factors are that are being used to indicate the SAP/PRSP areas as a location for a major destination entertainment or retail project. Without this information it is not just speculative but impossible to give credence to the acceptability of projections for land development associated with the EMU district. The county and the public cannot rely on the conclusions of the DEIR under such fluid conditions. The EMU district and the amount of development in this land use would be a major factor in determining GHG emission impacts and mitigation. The DEIR is not specific as to which impacts result from which of the 20 year phases and beyond that are being calculated for. This makes the DEIR useless for evaluating the impacts. The vague and fluctuating build out projections make the creation of an adequate DEIR impossible. At 4.12-10 the DEIR projects generation of 40,804 new jobs, but at 4.12-8 the DEIR says the area could support up to 15,300 jobs by 2035 and the number of jobs that could be supported according to the market analysis is lower than the number assumed at build out. What it does not say is which numbers of jobs the impacts and mitigation measures are based upon. This makes the DEIR useless for evaluation of the environmental impacts. The DEIR also does not explain how many of these jobs will be primary wage earner jobs, which is absolutely necessary to plan for housing if you intend to make a good faith effort to reduce VMT's and GHG emissions. Also at 4.12-11 the DEIR acknowledges that the build out of the SAP and PRSP areas will have significant unavoidable impacts on the environment, but there is no analysis of these impacts as is required by CEQA in any DEIR, and no proposed changes to the project to offset some or all of those impacts such as reducing the number of housing units or changing the housing mix, are discussed. The reliance on carbon offset programs to mitigate the 46,361,760,000 (46 billion) ton operational GHG emissions over the 80 year build out (4.7-21

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and appendix K) is not allowed under CEQA unless there is a functioning, enforceable, and effective implementation program. Where does the DEIR provide evidence that the offset program would be enforceable or effective? The fees for offsets are expensive and the DEIR does not take into account whether project proponents would be able to afford the fees. Fees currently run from 8 to 35 dollars per metric ton of CO2e. (DEIR at 4.7-21) Because this comes out to 1.6 billion dollars to offset 46 billion tons of GHG, and the DEIR does not explain how the project proponents will be able to afford this amount in offset fees, the DEIR fails to proved evidence that the offset fees are a feasible form of mitigation. Because of the cost and the requirements imposed by CAPCOA and CARB for the offset fees to be legal, and the lack of any explanation in the DEIR of how the requirements will be met or enforced, the proposal of carbon offset programs is not a feasible mitigation. The DEIR admits that the affordability and availability of GHG credits in the future is unknown. (4.7-23) The County cannot, as it does in the DEIR, conclude that the impact is significant and unavoidable and leave it at that. A more detailed analysis of how adverse the impact will be is required and the County must propose all feasible mitigation to substantially lessen the significant environmental effect. CEQA Guidelines 1509 (a)(1), 15126.2(b) (requiring an EIR to discuss "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance".) Other measures exist to reduce impacts. If they are not already part of the proposed requirements for development or proposed as mitigation, the County must consider and adopt the list below of feasible measures. If the County rejects any of the these measures, it must support its decision with substantial evidence.

52-13 cont.

1. Transportation and Motor Vehicles
- Create car sharing programs. Accommodations for such programs include providing parking spaces for the car share vehicles at convenient locations accessible by public transportation.
- Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.
- Build or fund a transportation center where various public transportation modes intersect.
- Contribute funding to local and regional transit agencies.
- Provide public transit incentives such as free or low-cost monthly transit passes.

2. Energy Efficiency
- Site buildings to take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
- Install efficient lighting and lighting control systems. Use daylight as an integral part of lighting systems in buildings.
- Install light colored "cool" roofs, cool pavements, and strategically placed shade trees.
- Provide information on energy management services for large energy users.
- Install energy efficient heating and cooling systems, appliances and equipment, and control systems. ● Install light emitting diodes (LEDs) for traffic, street and other outdoor lighting.
- Limit the hours of operation of outdoor lighting.
- Provide education on energy efficiency.

3. Renewable Energy

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● Install energy-efficient heating ventilation and air conditioning. Educate consumers about existing incentives.
● Use combined heat and power in appropriate applications.

4. Water Conservation and Efficiency
● Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. ● Design buildings to be water-efficient. Install water-efficient fixtures and appliances.
● Restrict the use of water for cleaning outdoor surfaces and vehicles.
● Implement low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.)

52-13 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.9-1: Increased stormwater runoff and potential for downstream flooding Significant and unavoidable
Table 2-1 of the Executive Summary mentions the Pleasant Grove Retention Facility (PGRF) 32 times in identifying the impacts of the project. Is it legal for this DEIR to rely on so many mitigation measures to be addressed by a project like the PGRF which has not yet gone through environmental review and has been identified has having itself many significant and unavoidable impacts? These impacts include : interfere substantially with native nursery sites (bat colonies), loss of trees protected under City ordinance, impacts on riparian habitat, possible impacts on special-status reptile, bird, and mammal species, impacts on valley elderberry longhorn beetle, vernal pool fairy shrimp, vernal pool tadpole shrimp and western spadefoot impacts, loss of vernal pool invertebrates, impacts on special-status plant species, loss of aquatic resources, loss of farmland converted to nonagricultural uses on the Pleasant Grove Retention Facility property. There seems to be some ambiguity in the DEIR regarding the loss of cultural sites caused by construction of the PGRF. Under Impact 4.5-2: Change in the significance of a unique archaeological resource, mitigation measures are outlined for the four archaeological sites and two multicomponent sites known within the Net SAP area, but the following statement occurs: "however, the Pleasant Grove Retention Facility and a portion of the Off-Site Transportation and Utility Improvements would not be subject to these policies. This impact would be potentially significant." Is this because the mitigation of impacts on these cultural sites would be the responsibility of the City of Roseville? Again I wonder, is it legal for Placer County to pursue a strategy basing mitigation measures for the SAP on a project, the PGRF, that has not yet fulfilled the requirements of approval? Impact 4.9-1: Increased stormwater runoff and potential for downstream flooding. Under this impact the DEIR states that, "the City of Roseville or a City of Roseville / Placer County JPA would be the project proponent and CEQA lead agency for implementation of the Pleasant Grove Retention Facility. Because the County could not enforce implementation of this off-site retention project, this impact would be significant." Can the impacts of storm water run off from the SAP at build out be mitigated without the PGRF? On page 23 of the DEIR section Sunset Area – Storm Drainage Technical Report it reads, " The specific location for retention has not yet been determined, however, regional retention facilities within the Natomas Cross Canal watershed are planned to be utilized. The City of Roseville's Reasons Farms (now called the Pleasant Grove Retention Facility) regional retention basin is currently being analyzed for proposed offsite retention in the Pleasant Grove Creek Watershed and two alternative regional locations are being proposed in the Auburn

52-14

Ravine Watershed. Should the Sunset Area develop prior to regional facilities becoming available, interim retention facilities will be utilized." The DEIR does not provide any detail about where, or about the cost of these interim retention facilities. This is a major inadequacy of the DEIR. These two alternative locations are not identified in the DEIR, but Lakeview Farms in the City of Lincoln in the Coon Creek watershed some miles away is addressed in the Sunset Area – Storm Drainage Technical Report section of the SAP DEIR. The transportation of storm water to the Lakeview Farms site would require installing storm drains under the Auburn Ravine in areas where endangered Central Valley Steelhead and threatened fall run Chinook Salmon spawn. Storm drains under creeks eventually become exposed creating barriers to fish passage. It is not adequate for the DEIR to take the opinion that because an impact like creation of a barrier to fish passage takes place off site that the project has not responsibility for that impact. If the storm-water from the SAP is in the pipe that is causing the blocked fish passage, it is clearly an impact caused by development on the SAP. At the planning commission hearing for the DEIR on February 14, 2019, lead planner Crystal Jacobson said that on site storm-water storage was being considered. I don't find any mention in the DEIR of interim on site storm-water retention. If the County is using this as a backup plan it should be addressed in the DEIR. The DEIR for the Pleasant Grove Retention Facility states that the cost of building the facility is $20,350,000 to 28,125,000 in 2002 dollars, not including any enhanced restoration planting or recreation trails. That cost in today's dollars is now 40% higher. This cost estimate is for the initial facility, not including the expansion to accommodate the SAP and PRSP. The environmental document for the expansion has not yet begun to be developed. The SAP and PRSP DEIR does not address how this money will be raised, but relies on the project being built to accommodate the storm-water run off from the project. I question if it is even legal for Placer County to proceed with the SAP process under this tenuous situation. There is no guarantee that there will be anyplace for the storm-water runoff from the SAP to go. When I asked Crystal about the cost of the PGRF expansion to accommodate storm-water from the SAP and PRSP, she said the details on how the money will be raised is the responsibility of the City of Roseville where the site is located. So I conclude that is the opinion of the DEIR. Why can the DEIR rely on the PGRF expansion without any attention to how it will be funded?

52-14 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.9-4: Water quality impacts from urban land uses Significant and unavoidable
This impact description states, "projects within the project area would be required to comply with CVRWQCB, Placer County, and proposed SAP regulations, and permit conditions and would implement LID measures and stormwater BMPs to prevent urban pollutants from being carried into surface waters" However again there is no mention under the proposed mitigation measures of the Pleasant Grove Retention Facility PGRF. Is it possible for the project to meet the storm water regulations designed to prevent water quality impacts without the PGRF?

52-15

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.9-5: Development within 100-year floodplains Less than significant
The mitigation measures for this impact call for "finished building pad elevations to be a minimum of 2 feet above the 100-year floodplain line (or finished floor 3 feet above the 100-year floodplain line.)" What

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I do not see are any references to how long the 100 year floodplain map will remain reliable in light of the changes in spring run off due to warming spring weather and stronger storms as a result of the climate change we are now experiencing. The 5 hottest years on record have occurred during the past 5 years according to a NASA . "the past five years become the five warmest since reliable measurements began more than a century and a half ago. Gavin Schmidt, director of NASA's Goddard Institute for Space Studies, says it's part of a trend that's poised to see the planet become much hotter.
Gavin Schmidt: "What kind of planet is a planet that's 4 or 5 degrees warmer than it is now? Well, we haven't seen that on Earth since about 3 million years ago in the Pliocene. At that point, we had forests all the way up to the Arctic Circle, there wasn't any ice, there was no Greenland, and sea level was about 25 meters higher. Right? That was a very different planet, and that's kind of where we're headed, unless we do something about emissions." Wednesday's (2-6-2019) climate report came as two House committees held simultaneous hearings to discuss the climate crisis. They were the first such meetings on Capitol Hill in six years. What mitigation measures have been modified by the DEIR consultant to take into account changes that are currently taking place in our climate?

52-16 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.14-10: Impacts to freeway operations Significant and unavoidable
The SAP falsely asserts that it is mitigating this impact by requiring or providing incentives to build housing in the SAP that will comply with Bus Rapid Transit compatible design. Page 52 of the CISGP provides the Exclusive Comparison: Accessibility - Walk Report. This shows that with the CISGP 100% of residents are living in minimum required density of 9 du/ac to support Bus Rapid Transit as outlined in the SAGOG Blueprint and the Conceptual Bus Rapid Transit (BRT) plan for South Placer County, (see sections 3 and 4) as opposed to the SAP where only 12% of residents live within the required density of 9du/ac. In the CISGP 45% of Non-Residential Uses comply with the minimum FAR (floor area ratio) of 1.0 required to support Bus Rapid Transit as opposed to 0% in the SAP. For the Work Commute under the CISGP 100% of Residents live within 15 minute walking distance of a job site. Under the SAP this figure is only 9%. Under the CISGP 61% of of Job sites are within 15 minute walking distance for a residence while under the SAP this number is only 38%.The SAP fails to provide the required density of development to be Bus Rapid Transit compatible according to the SACOG blueprint. The CISGP does comply with the SACOG blueprint and is Bus Rapid Transit compliant, and so the county should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative.

52-17

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.12-1: Population growth from new homes and businesses Significant and unavoidable
The DEIR lists no mitigation for this impact but admits that "the physical effects resulting from this level of population and employment growth (e.g., traffic generation, air pollutant and GHG emissions, noise, demand for services, construction of utilities and infrastructure) would be substantial. This impact would be significant." But if the County recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative, and the CISGP is adopted as the preferred plan, there will be significant reductions in the impacts from population growth from new homes and businesses. On page 46 of the CISGP the Exclusive Comparison evaluates at the zoning level only, excluding CISGP reduction measures such as

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public transit and walking trails that would reduce impacts further. Because of this it is a fair comparison with the SAP and also represents a worst case scenario. The SAP numbers are the combined totals from the December 2018 SAP Draft and December 2018 PR Draft. In the category of GHG Emissions Per Household by Source, metric tons / household / year, the CISGP reduces emissions below combined SAP and PRSP levels by 79% for annual passenger vehicle emissions per household (and this is without public transit). Emissions for annual building energy emissions per household are reduced under the CISGP by 39% and Annual water-energy emissions per household are reduced under the CISGP by 66% from the SAP PRSP levels. Page 52 of the CISGP provides the Exclusive Comparison: Accessibility - Walk Report. This shows that with the CISGP 100% of residents are living in minimum required density of 9 du/ac to support Bus Rapid Transit as outlined in the SAGOG Blueprint and the Conceptual Bus Rapid Transit (BRT) plan for South Placer County, (see sections 3 and 4) as opposed to the SAP where only 12% of residents live within the required density of 9du/ac. In the CISGP 45% of Non-Residential Uses comply with the minimum FAR (floor area ratio) of 1.0 required to support Bus Rapid Transit as opposed to 0% in the SAP. For the Work Commute under the CISGP 100% of residents live within 15 minute walking distance of a job site. Under the SAP this figure is only 9%. Under the CISGP 61% of of job sites are within 15 minute walking distance for a residence while under the SAP this number is only 38%.

52-18 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.14-2: Impacts to intersection operations in Placer County Less than significant
I disagree with the claim of a less than significant impact. The DEIR bases this assertion on fair share fees offsetting impacts, but those fees come available for use long after the impacts are already being felt, so the impacts will be significant. If the County recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative, these impacts will be reduced substantially because the CISGP reduces VMT (vehicle mile trips) as shown on page 64 of the CISGP. The Comparison in Context: Transportation Report shows the reduction under the CISGP from the SAP in Average Annual VMT per Household is 1475.55 in billions of miles per year. Rather than relying only on fair share fees to offset impacts, the DEIR should be looking at an environmentally superior alternative that will reduce the impacts on intersection operations through reduction of total vehicle mile trips.

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Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.14-3: Impacts to signalized intersection operations in the City of Roseville Significant and unavoidable and Impact 4.14-4: Impacts to unsignalized intersection operations in the City of Roseville Significant and unavoidable Impact 4.14-5: Impacts to intersection operations in the City of Rocklin Significant and unavoidable Impact 4.14-6: Impacts to intersection operations in the City of Lincoln Significant and unavoidable Impact 4.14-9: Impacts to intersection operations under Caltrans jurisdiction Significant and unavoidable Impact 4.14-12: Impacts to vehicle miles traveled Significant and unavoidable
If the county recirculates the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative, these impacts will be reduced substantially because the CISGP reduces VMT (vehicle mile trips) as shown on page 64 of the CISGP. The Comparison in Context: Transportation Report shows the reduction under the CISGP from the SAP in Average Annual VMT per Household is 1475.55 in billions of miles per year. Rather than relying only on fair share fees to offset impacts, the DEIR should be looking at an environmentally superior alternative that will reduce the impacts on intersection operations through reduction of total vehicle mile trips.

52-20

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
4.14-10: Impacts to freeway operations Significant and unavoidable Impact
It should be noted in the DEIR that the funding to make the necessary improvements to Hwy 65 and Hwy 80 in order to compensate for the impacts of increased VMT resulting from the projected build out of the SAP and PRSP areas has not been identified as of yet.

52-21

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.15-10: Consistency with applicable general plan policies Less than significant
I contest the DEIR statement that the SAP and PRSP are consistent with the Placer County General Plan. Under the housing element of the PCGP the projected housing needs for various categories of housing types are listed on page 49. The mix of housing listed here does not dovetail with the housing mix for the SAP and PRSP. The proposed land use map does not integrate workforce and affordable housing in with other types of housing as required by the PCGP but locate it clustered up against the Placer Parkway and inside the smell zone of the sanitary landfill. University housing should not be counted in the 10% affordable housing requirement, and this stipulation should be stated in the DEIR. The CISGP states as a goal under Housing Choice Support: "Provision of attractive and under represented housing types locally to accommodate employees of Sunset Area businesses and make a synergistic atmosphere. Integrate housing into mixed use areas to prevent housing islands." It accomplishes this goal by reducing single family large lot sprawl and encouraging mixed use urban core housing. In so doing the CISGP is more in line with the goals of the PCGP and the DEIR is out of sync with the PCGP goals. Another stated goal of the CISGP missing from the DEIR is Regional Housing Balance: "Balance the scale of Placer's affordable and achievable housing options so the ratios better reflect Placer County residents. Incorporate equity by design to make desirable living places for all income levels." The Exclusive Comparison: Summary Stats Report on page 50 of the CISGP compares the housing mix between the SAP and the CISGP. The CISGP provides a superior housing mix for the future workforce in the south Placer area while also reducing the

52-22

negative environmental impacts that are in conflict with the PCGP. For these reasons the County should recirculate the DEIR to allow a full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan as the environmentally superior alternative. 52-22 cont.

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.3-2: Construction emissions of criteria air pollutants and ozone precursors Significant and unavoidable
The DEIR lists a litany of mitigation that is required of developers to reduce impacts to a less than significant level**.** Who will enforce these mitigation measures, which are very detailed? Will the existing County staff be responsible for this oversight? I have seen mitigation measures go unenforced in other projects due to lack of oversight by Placer County, oversight that should have been done to enforce compliance.
Will the County employ biologists, hydrologists, cultural anthropologists and other trained scientists to ensure that mitigation measures are implemented and monitored in perpetuity? How much time will be required to monitor all these mitigation measures and at what cost? If the County proposes to allow developers to enforce County mandated mitigation measures, please describe how this work will be monitored by the County and what mechanism is in place to monitor for mitigation performance and to remedy false or failed mitigation. This enforcement should not be citizen complaint driven. I had to personally document grading violations at the Winchester Estates development and provide that documentation to the County before fines were imposed and an end was put to the violations. That should not be the way enforcement works. The fines are not sufficient in some instances to provide any deterrent whatsoever. 52-23

Quoting the table 2-1 of the **Sunset Area Plan/Placer Ranch Specific Plan Draft EIR**
Impact 4.2-1: Conversion of Farmland to a nonagricultural use Significant and unavoidable
The DEIR acknowledges that the Project could result in the total conversion of up to 7,295 acres of Farmland. The DEIR includes a mitigation measure calling for farmland to be preserved at a 1:1 ratio.. However, the measure is incomplete, inadequate and unenforceable. Consequently, the DEIR lacks any evidence to support that the mitigation measure will effectively reduce farmland-related impacts. The measure relies on the Placer County Conservation Plan (PCCP) "at such time as it is adopted." The DEIR never explains how the eventual preparation of the PCCP will result in the preservation of Farmland. The mitigation measure relies on a "series of farmland preservation management plans" that will accompany each proposed development project in the SAP and PRSP, but the DEIR fails to describe these plans or explain how their preparation would reduce impacts and loss of farmland. The DEIR says that no additional mitigation would be required "as long as a substantial portion (as determined by the planning director in consultation with the County agricultural commissioner) of the mitigation lands acquired is undeveloped." The DEIR never defines the term "substantial portion." This seems to not be consistent with the mitigation goal of preserving farmland at a ratio of 1:1. What is the economic value of the ecosystem services that these lands provide? Nowhere in the DEIR are these services valued, and only if they are valued can the County make a rational decision regarding whether economic benefit associated with implementation of the SAP and PRSP exceeds the economic value of the ecosystem services provided by the agricultural lands (including agricultural economic production value, as well as carbon sequestration, oxygen, habitat etc.) The DEIR states in mitigation measure 4.2.1b that farmland preserved for the 52-24

Shirlee Herrington, Environmental Coordinator
Placer County Community Development Resource Agency
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purposes of habitat mitigation may be counted toward Farmland mitigation. I take exception to this. Farmland mitigation and habitat mitigation are mutually exclusive. Land used for farming is generally not habitat. Farms can be managed in such a way that migrating birds can use it in the fallow season, for instance in flooded rice fields, but farmland does NOT provide the same habitat for non-migratory animals that non farmland provides, so the last sentence of Section 4.2 should be amended or removed.

In addition to the comments made above, I request the County also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. The CISGP is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. CEQA Guidelines describe the circumstances that require re-circulation of a draft EIR. Such circumstances include: (1) the addition of significant new information to the EIR after public notice is given of the availability of the DEIR but before certification, or (2) the draft EIR is so "fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." CEQA Guidelines § 15088.5. The DEIR fails to accurately estimate the environmental impacts and asserts that mitigation measures that are not feasible will mitigate impacts. The project description contains so many variables that it becomes impossible for anyone to make an accurate assessment of the environmental impacts. County will need to prepare a revised EIR that includes substantial new information.

52-24 cont.

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Scott Johnson
15215 Bancroft Road
Auburn, CA 95602
530-878-1566
scottj@johnsonpianoservice.com

Letter 52 Scott Johnson, February 19, 2019

52-1 The comment provides some examples of the project's significant and unavoidable impacts. These impacts are also listed in Table 2-1 of the Executive Summary and in Section 5.1, "Significant and Unavoidable Impacts," of the Draft EIR. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

52-2 The comment states that the Draft EIR does not analyze or provide mitigation for impacts to wildlife or human health and wellbeing resulting from light pollution. Although the EIR states that no mitigation is available to reduce Impact 4.1-4, it should be noted that various lighting reduction measures would be required through existing and proposed policies. On page 4.1-24, the Draft EIR states:

> Parking lots and other similar areas may have tall light standards for safety and security. Placer County General Plan Policy 1.0.9 discourages the use of outdoor lighting that shines unnecessarily onto adjacent properties or into the night sky. Proposed SAP Policy LU/ED-3.9 requires adherence to several lighting design principles, including designing lighting to minimize projection into adjacent properties and onto adjacent roads, and capping the size of light standards to 18 feet. The SAP Corridor Design Standards and Guidelines require all lighting to be Dark Sky compliant and for lighting to minimize glare. A PRSP Development Standard and Design Guidelines requirement is that lighting for hardscape elements and signage should not create upward glare visible to drivers or from adjacent land uses. These measures would help limit brightness and amount of light associated with the project development.

Nighttime lighting reduction would be implemented due to compliance with SAP policy, and no additional mitigation measures are necessary. Although the commenter refers the County to the "Dark Sky group" and an article with case studies, the commenter does not identify, and the County is not aware of, additional measures that would be feasible and would further reduce impacts of the potentially significant nighttime lighting impact. In addition, as previously noted, lighting must be Dark Sky compliant. Therefore, the Draft EIR has not been revised in response to this portion of the comment, and Impact 4.1-4 remains significant and unavoidable.

The commenter asks why the County would not use available mitigation and technologies and policies to protect views of the night sky. On page 4.2-16, the Draft EIR explains that there are no additional feasible measures beyond the required policies and design measures that would reduce impacts to less than significant:

> Although lighting would be minimized to the extent possible as a result of existing and proposed General Plan policies, including the directional requirements, capping of light standards, and minimizing spillover, the sheer quantity of lighting would create a new source of light pollution related to the substantial source of light across the project area. As a result, nighttime lighting impacts would be potentially significant. No feasible mitigation, beyond the policies and design measures, would be available to prevent the cumulative effect of light across the entire project area. Therefore, the impact related to nighttime lighting would be **significant and unavoidable**.

As explained, several approaches are integrated into existing and planned policies, standards, and guidelines. Furthermore, CEQA's mandate to reduce impacts is that an EIR shall describe feasible, fully enforceable measures that could minimize significant impacts (State CEQA Guidelines Section 15126.4[a]). The commenter has not provided other measures that may be feasible for the County's consideration; therefore, no revisions have been made to the Draft EIR in response to this portion of the comment.

In terms of lighting impacts on quality of life, the commenter does not cite a specific study or make specific claims about effects on sleep and quality of life. Therefore, only a general response can be provided to the commenter's assertion that the EIR does not reference medical research related to night skies and health and well-being. The County recognizes there is research that may indicate that artificial light and light pollution can have an adverse impact on health (see, for example, Chepesiuk 2009, Kraus 2016). However, State CEQA Guidelines Section 15145 indicates that a lead agency need not evaluate an impact that would be too speculative. Analyzing the impacts of nighttime lighting in the project area on the health of those nearby would be speculative for several reasons.

First, people generally sleep inside at night and have control over light pollution entering their sleeping quarters. For example, light pollution can be controlled in residences and hotels with curtains and sleep masks. Additionally, the County cannot determine what people will do to control light pollution; therefore, it would be speculative to determine how many people would block outdoor lighting from entering their sleeping quarters and how many would not. This information would, however, be necessary to determine the level of effect. Furthermore, so many other variables, such as noise and individual health, affect sleep quality. Finally, it cannot currently be known where specific light sources would be in the project area in relation to sleeping quarters, as no specific developments are proposed at this time. Therefore, it would be speculative to determine the ultimate health effects of project nighttime lighting.

The commenter notes that the EIR does not discuss light pollution impacts that can best be characterized as economic and social effects (e.g., enjoyment of the night sky as a tourist attraction and as an attraction of new jobs to the area). State CEQA Guidelines Section 15131 states that "[e]conomic or social information *may* be included in an EIR" (emphasis added) and that the "focus of the analysis shall be on the physical changes." Therefore, CEQA does not require analysis of economic and social effects, and, if provided, the evaluation should focus on physical changes. The commenter has not identified, and the County is not aware of, physical impacts associated with the importance of the night sky to tourism in Placer County or the importance of night sky views to home, job, and business relocation to the County. The EIR evaluates impacts of the project on the environment, and the possibility of people traveling and moving to Placer County due to night sky views is not an impact of the proposed project on the environment. Therefore, no changes to the Draft EIR have been made in response to the comment.

In the final paragraph of this commenter, it appears the commenter suggests that the County will allow structures that are not Dark Sky compliant because those guidelines have not been followed in adjacent communities. Regardless of what guidelines are followed in other communities and contrary to the commenter's suggestion, development within the project area would be required to follow certain Dark Sky measures, as previously described. Furthermore, the commenter's suggestion that buildings in surrounding communities be brought into Dark Sky compliance is not relevant to the proposed project, as the proposed project does not involve activities outside of the defined project area.

The commenter suggests the Draft EIR should quantify light pollution and costs associated with it; however, such an exercise would be infeasible, and, insofar as the commenter is referring to monetary costs, such an analysis is not required by CEQA. Light pollution is measured through aerial imagery; this measurement is of existing light pollution and is not a model of future light pollution. The County is unaware of a widely accepted practice for modeling future or planned light pollution levels. If there is an accepted methodology, modeling light pollution from the proposed project would nevertheless be infeasible because the ultimate building lighting configurations and locations cannot be known at this time because no development is being proposed. As a result, it would not be possible to come up with a reasonably foreseeable lighting scenario to model. Furthermore, the analysis in the Draft EIR is adequate as written, and the conclusion that lighting impacts would be significant and unavoidable is adequately supported.

Also, see response to comment 71-4.

52-3 The comment states that the CISGP would reduce long-term operational emissions of criteria air pollutants and ozone precursors over the project. See Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that the CISGP would likely result in greater levels of air pollutant emissions than the proposed project.

The comment suggests that removal of the Regional Shopping Center and Cornerstone District proposed in the CISGP would reduce vehicular trips; however, this is not substantiated in the CISGP nor in this comment. It should be noted that a "regional shopping center" would be allowed but is not

specifically identified as a land use in the SAP. The Draft EIR's traffic analysis conservatively uses regional shopping center in the EMU to evaluate trip generation and estimate VMT, but that does not mean that a regional shopping center would develop in this location. Replacing the "regional shopping center" with a less vehicle-intensive use in the analysis would likely reduce traffic, VMT, and GHG estimates/impacts, but would yield less conservative results. Therefore, the Draft EIR's analysis is appropriate.

The comment asserts that the project would include a shopping mall that is larger than several nearby shopping malls including the Galleria and Fountains in Roseville. As mentioned above and described on page 1-5 of the Draft SAP, the EMU designation could include a wide variety of uses, including entertainment venues, theme parks, super-regional destination retail, shopping, restaurants, recreational facilities, hotels, health care-related services, residential, and utility and safety facilities. Because there are a variety of uses allowed in this land use designation, and specific developments are not yet known, it cannot be assumed that the project would include a shopping mall larger than nearby retail.

The comment also addresses local retail profits. This is not an environmental issue that is evaluated under CEQA. The comment does not address the content, analysis, or conclusions of the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding project approval.

52-4 The commenter's disagreement with the analysis in the Draft EIR is noted; the County believes the Draft EIR accurately reflects impacts that would occur under the proposed project and reflects the requirements for analysis under CEQA.

See Master Response 4: Odors for a discussion of the Draft EIR's evaluation of odor impacts, including which impacts are appropriately treated as speculative in the Draft EIR. Although food waste diversion is expected to increase over time, resulting in greater composting activities, the Draft EIR addresses impacts against an appropriate baseline. As explained on Draft EIR page 4-3, "the baseline conditions for this Draft EIR are generally the conditions that existed in the SAP area in 2016," consistent with State CEQA Guidelines Section 15125(a). The Draft EIR explains that "[t]his setting generally serves as the baseline against which environmental impacts are evaluated." Therefore, the EIR properly analyses impacts associated with the landfill against existing conditions rather than conditions in the future

See Master Response 4 regarding potential future expansion of the WRSL. See Master Response 2: Citizen-Initiated Smart Growth Plan regarding impacts of the CISGP.

52-5 The comment suggests that mitigation has not been applied to address the project's long-term operational air pollutant and precursor emission impact. The comment points to the cumulative impact, Impact 4.3-8 as offering no available mitigation. However, Impact 4.3-3 of the Draft EIR includes Mitigation Measures 4.3-3a, 4.3-3b, 4.3-3c, and 4.3-3d which all reduce the project's operational air pollutant emissions. While the mitigation measures do not reduce the project's level of emissions to less than significant, it provides numerous feasible measures to reduce emissions. Beyond the mitigation measures included in Impact 4.3-3, there are no other mitigation measures that could be applied that would be cumulatively beneficial. Thus, the significance conclusion remains significant and unavoidable.

The comment suggests that vehicular trips and associated mobile-source emissions would be reduced under the CISGP in comparison to the proposed project. See Master Response 2: Citizen-Initiated Smart Growth Plan.

The comment also discusses the potential reduction to vehicular trips by removing the Regional Shopping Center and Cornerstone District. See response to comment 52-3.

The comment suggests that BRT is needed to serve the project area, particularly because there have been recent investments in transit lines, such as the Capitol Corridor train, that would bring more commuters to Placer County. The planning and implementation of BRT is not done at a plan-level scale because there would not be connections outside the project area that would serve BRT.

52-6 The comment states the CISGP would reduce impacts on federally protected waters compared to the SAP. See Master Response 2: Citizen-Initiated Smart Growth Plan. The comment states the Draft EIR does not give adequate attention to the need to restore and protect streambanks for the benefit of Central Valley steelhead and fall run chinook salmon in Auburn Ravine. The Draft EIR is not required to address impacts on Central Valley steelhead that are not related to the project. As noted on page 4.4-52, indirect effects of project implementation on special-status fish habitat outside the project area would be less than significant with compliance with CVRWQCB, Placer County, and proposed SAP regulations and permit conditions, and implementation of LID measures and stormwater BMPs to protect downstream water quality and fish habitat. Therefore, additional measures to reduce the impact even further are not required.

52-7 The comment states that it is necessary to preserve archipelagos of vernal pools; however, this term "archipelagos of vernal pools" does not have an ecological definition. The SAP Preserve/Mitigation Reserve land use designation comprises approximately 2,300 acres in the northern portion of the SAP area that contains the largest contiguous patches of high-density vernal pool complexes in the SAP area. It includes approximately 1,800 acres that are already preserved as permanent open space in four existing reserves. These preserve/mitigation reserve areas (see Exhibit 3-5, "SAP Land Use Diagram") create large, interconnected preserves that would continue to provide habitat value to vernal pool species after the SAP is built out.

The comment also states that moving the university to a different location in the SAP area would forestall impacts from building on soil types that have properties that severely limit their ability to support buildings and require specialty equipment and soil preparation that is irreversible. Soil stability is addressed in the Draft EIR in Section 4.6, "Geology and Soils." In this section, the Draft EIR discloses that expansive soils occur within the net SAP area and the PRSP area. The Draft EIR identifies mitigation measures requiring submittal of geotechnical reports, which would identify specific recommendations for the design of structures and facilities to avoid adverse effects associated with these soils. The mitigation measures also require implementation of the recommendations identified in the geotechnical reports.

The comment also states the SAP does not do enough to fit land uses around the vernal pool landscape and instead allows the developer to put desired land uses onto valuable and diverse vernal pool landscapes. Nearly the entire SAP area, including the PRSP area, supports vernal pool complexes so moving the university to a different area within the SAP area would not eliminate impacts on vernal pool resources. The area identified for the university is within an area that supports low density vernal pool complexes (<1-percent density of vernal pool type wetlands). Therefore, moving the university to another undeveloped location would produce similar or greater losses of vernal pool habitat. Urban development within vernal pool complexes constitutes a permanent and irreversible loss of habitat no matter which soil type underlies the development.

See Master Response 2: Citizen-Initiated Smart Growth Plan. As discussed in the master response, the County finds that locating the university site in an area that has substantial existing development, as proposed in the CISGP, would be infeasible.

52-8 The comment states that planting elderberry shrubs for mitigation is not effective because of low survival rates and questions if adequate surveys were conducted to ascertain presence of elderberry shrubs. The project is not responsible for restoring elderberry shrubs that may have existed in the SAP historically but were removed as a result of past grazing practices. The Draft EIR acknowledges that elderberry shrubs may be present in the net SAP or the PRSP area and other supporting infrastructure sites (see Impact 4.4-4). As noted on page 4.4-49 of the Draft EIR, no elderberry

shrubs were found in the PRSP area during protocol-level elderberry surveys conducted in 2005 or during the reconnaissance-level survey conducted in 2017, but elderberry shrubs may have established within the riverine/riparian complex in the PRSP area in the intervening years since the surveys were completed. Considering the 80-plus-year planning horizon of the SAP, it is appropriate to delay protocol-level surveys for elderberry shrubs to the period right before individual development projects are implemented because the abundance, size, and distribution of elderberry shrubs change over time. Access has not been granted to do protocol-level surveys on the net SAP area and biological resources impacts are analyzed at a program level of detail for the net SAP area. The proposed mitigation measures (Mitigation Measure 4.4-4a) for impacts on elderberry shrubs, should any be found during future project surveys, are consistent with the U.S. Fish and Wildlife Service's requirements for protection of valley elderberry longhorn beetle. Compensation for loss of elderberry shrubs may include purchasing credits at a USFWS-approved conservation bank, providing on-site mitigation, or establishing and protecting habitat for valley elderberry longhorn beetle as directed by USFWS consistent with their 2017 Framework.

52-9 The comment states that the CISGP would do a better job of preserving species displaced by construction because it preserves more riparian corridors and native grasslands. There are no native grasslands in the SAP area except possibly within the existing and planned reserves in the northern portion of the SAP area. Therefore, the CISGP does not preserve any additional native grasslands compared to SAP. As noted on page 4.4-64 of the Draft EIR, the majority of riparian habitat within the net SAP area is along Orchard Creek in the designated Preserve/Mitigation Reserve land use. There is very little (8 acres) riparian vegetation in the PRSP area. Valley foothill riparian habitat is restricted to the tributary to Pleasant Grove Creek in the southeast portion of the PRSP area. As noted on page 4.4-64 of the Draft EIR, the PRSP has been designed to avoid removal of riparian habitat through preservation of riverine/riparian complexes within designated open space preserve areas consistent with SAP policies. Therefore, the CISGP does not preserve any additional riparian habitat compared to SAP. Also see Master Response 2: Citizen-Initiated Smart Growth Plan regarding the differences between the proposed project and the CISGP, as well as the similarities between Alternative 4 (included in the Draft EIR's alternatives analysis) and the CISGP in terms of biological resource avoidance.

The comment states the Draft EIR provides an inadequate analysis of loss of native oaks. There are few native oak trees in the project area, and they are primarily located within the riparian/riverine complex areas that are planned to be retained within the open space land use designation. Sixty-three native oak trees were identified in the PRSP area during an arborist survey conducted in 2006. While some of these may have died since then and new saplings may have established, the numbers of native oak trees are unlikely to have changed substantially. The PRSP area remains relatively treeless with the exception of the riparian/riverine complex areas that are planned to be retained within the open space land use designation. Trees are relatively scarce in the net SAP area, and a large percentage of those present are ornamental trees associated with the existing rural residences and commercial developments (page 4.4-66). Most of the native trees present in the net SAP area are along Orchard Creek within the proposed Preserve/Mitigation Reserve land use designation (already an existing preserve) so they would not be removed. Mitigation Measure 4.4-7 on pages 4.4-67 and 68 of the Draft EIR describes exactly how loss of native trees would be mitigated (avoided or compensated) consistent with Placer County Code.

52-10 The comment states that the SAP mitigation relies too heavily on payment of mitigation fees and increasing riparian buffer widths consistent with the CISGP on-site would preserve more of the exceptionally high-value riparian habitat in the SAP and reduce loss and degradation, especially in the University District. There is no riparian vegetation in the University District Land Use designation. See Exhibit 4.4-2, "Land Cover," for distribution of the Riverine/Riparian Complex, which is the land cover category that encompasses riparian habitat. The University District land use designation includes seasonal swales and intermittent stream channels that support a few scattered cottonwood trees and not "exceptionally high-value riparian habitat." The intermittent streams are already

substantially degraded and incised, and the project is not responsible for restoring riparian vegetation that may have existed in the SAP area historically but was removed as a result of past grazing or other land use practices.

See also Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that although the CISGP proposes wider Riverine/Riparian Complex setbacks, it would still result in a linear preserve network surrounded by urban development. This means that, similar to the project, riparian habitat value in these areas would be diminished for most species, and riparian habitat would be subject to the same types of indirect impacts from intrusion by humans and domestic pets, increased noise and light pollution, dumping or accumulation of litter and debris that is harmful to wildlife, and alteration of hydrologic regime (e.g., transition from seasonal to perennial inundation). Also see responses to comment 52-9 regarding riparian habitat in the SAP area.

52-11 The comment states that the CISGP allows greater retention so there would be less mitigation needed for tree loss and again states that the Draft EIR does not disclose the number of oak trees that exist and how many would be destroyed. See Master Response 2: Citizen-Initiated Smart Growth Plan regarding the level of impact reduction achieved by the CISGP and the feasibility issues associated with the CISGP. See response to comment 52-9 regarding oak trees.

The comment further states there is no mention of how to mitigate loss of special-status plants and animals, wetland and riparian habitats, vernal pool complexes, streams and stream zones, and large, unfragmented natural habitat areas.

Impacts to special-status plants are reduced through implementation of Policy NR 2-1: Special-status Plant Species Protection and Program NR-5: Special-status Plant Species Protection Guidelines, which are described on pages 4.4-32 and 33 of the Draft EIR. As stated on page 4.4-43 of the Draft EIR, implementing SAP Policy NR 2-1 and Program NR-5 would reduce impacts on known and potentially-occurring special-status plant species within the project area and off-site improvement areas within the County's jurisdiction because project proponents would be required to identify and avoid special-status plant populations to the extent feasible, and provide compensation for the unavoidable loss of special-status plants through establishment of new populations, conservation easements, or other appropriate measures. Also see response to comment 14-1.

Impacts to wetland and riparian habitats and stream zones are mitigated through implementation of Policies NR-2.4: Stream Habitat Mitigation, NR-2.5: Setback Area Protection and Maintenance, NR-3.1: Sensitive Habitat Buffers, NR-3.3: Stream Corridor Encroachment, NR-3.4: Stream Corridor Natural Conditions, NR-3.5: Stream Protection Best Management Practices and Low Impact Development, Mitigation Measure 4.4-1a Compensate for loss of aquatic resources and Mitigation Measure 4.4-6a: Avoid, minimize, or compensate for loss of riparian habitat. These measures as well as Mitigation Measure 4.4-3b would mitigate impacts to vernal pool complexes; however, the impact would remain significant and unavoidable because there are currently no mitigation banks that service western Placer County with credits available to fully cover the loss of habitat resulting from project implementation, as noted on page 4.4-48 of the Draft EIR.

As noted on page 4.4-41 of the Draft EIR, successful implementation of the SAP policies and Mitigation Measures 4.4-1 a and 4.4-1b is expected to reduce significant impacts on wetlands and other waters of the United States, and waters of the state, but not necessarily to a less-than-significant level. While these measures would result in "no net loss" of overall wetland acreage, there may not be enough credits available on the market to fully offset the loss of wetland functions resulting from project implementation, and it is unknown if sufficient land would be available from willing sellers to fully mitigate the loss. Therefore, this impact would remain significant and unavoidable.

Master Response 2: Citizen-Initiated Smart Growth Plan addresses comments related to SACOG Blueprint consistency, as well as relative impacts related to traffic and transit.

52-12 The comment states the farmland to the west of the SAP area is a major riparian corridor used by various fauna for movement between the high Sierras and grasslands and that the CISGP would preserve more food and shelter plants for wildlife. The Essential Habitat Connectivity linkage cited in the comment is located mostly outside of the project area; therefore, the project would not impede use of the corridor. As noted in the CISGP, the corridor ends at the City of Roseville just south of the project site. Therefore, development of the SAP area would not eliminate linkages between large blocks of intact habitat or natural landscape. Since the CISGP would also result in development in the project area, impacts on this connectivity corridor would be essentially the same under both plans.

The Draft EIR acknowledges under Impact 4.4-8: Interfere substantially with wildlife movement (page 4.4-68) that the project would interfere with the movement of native resident wildlife species by developing large areas of natural habitat and eliminating connectivity across large portions of the project area and that the impact would be significant. Mitigation Measures 4.4-8a, 8b, and 8c are provided to reduce significant impacts on wildlife movement. As noted on page 4.4-70, successful implementation of these measures would minimize potentially significant impacts related to wildlife movement because these measures would require maintenance of interconnected natural areas sufficient to accommodate wildlife movement, which would protect biodiversity and sustain ecosystems. These measures would also require provision of a movement corridor linking the open space preserves in the PRSP area to Reserve/Mitigation Preserve areas to the north, reducing habitat fragmentation and eliminating risks from dead-end corridors in the PRSP area. It would also allow safe wildlife movement through the PRSP area by requiring wildlife crossings be incorporated into road designs where they dissect the open space preserves. However, implementation of Mitigation Measure 4.4-8a falls outside the County's jurisdiction, and the feasibility of incorporating wildlife movement features into the design of Placer Parkway is uncertain. Although implementation of this mitigation measure, along with measures 4.4-8b and 4.4-8c, would reduce the impact to a less-than-significant level, because the feasibility is uncertain and the County cannot enforce the measure, the impact remains potentially significant and unavoidable.

See Master Response 2: Citizen-Initiated Smart Growth Plan regarding the level of impact reduction achieved by the CISGP and the feasibility issues associated with the CISGP. Also, see Master Response 8: Recirculation.

52-13 The comment claims that the CISGP would reduce GHG emissions from several sources of GHG emissions. See Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that the CISGP would likely result in greater levels of GHG emissions than the proposed project.

The comment also states that the CISGP would reduce annual emissions of criteria air pollutants and precursors compared to the project, as well as provide greater carbon storage potential. See Master Response 2: Citizen-Initiated Smart Growth Plan, which explains that the CISGP would likely result in greater levels of air pollutant emissions than the proposed project.

The comment suggests that the Draft EIR should be recirculated to include the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative. Also See Master Response 8: Recirculation.

The comment questions the difference between several projections in employment based on project buildout. As explained in the Draft EIR on page 4.12-8, the market analysis conducted indicated that the project area could support up to 15,300 jobs by 2035. However, as explained on page 4.12-8 in

the next sentence, the Draft EIR uses a different methodology to quantify the potential number of new jobs by applying commonly-used rates of the number of employees per square foot or acre of non-residential development. It is also important to note that the employment projection of 40,804 jobs presented in Draft EIR Table 4.12-7 for the SAP represents full buildout of the entire SAP which would occur over 80 years, far beyond the market analysis buildout horizon of 2035. No revisions to the Draft EIR are necessary.

Regarding the comments raising issues with the assumptions made for the EMU, see response to comment 52-3. The Draft EIR identifies land uses for the trip generation and VMT estimates that are conservative such that the range of allowed uses identified in the SAP for the EMU would not be more traffic- or GHG-intensive than what was evaluated in the Draft EIR.

For the comment addressing the carbon offset credits, see the response to comment 12-12.

For GHG mitigation measures suggested by comments, see Master Response 5: Greenhouse Gas Mitigation.

52-14 The comment asks whether it is legal for the Draft EIR to rely on project level environmental review and mitigation, specifically related to the Pleasant Grove Retention Facility. As described in Chapter 3 of the Draft EIR, "Project Description," the Pleasant Grove Retention Facility is being evaluated as part of the proposed project. The comment incorrectly states that the Pleasant Grove Retention Facility has not yet gone through environmental review. The City of Roseville certified an EIR for the Pleasant Grove Retention Facility (City of Roseville Retention Basin Project EIR, State Clearinghouse Number 2000022007). See page 4-5 of the Draft EIR for more information. As explained on page 4-5, the Pleasant Grove Retention Facility, contemplated and analyzed at a project-level herein as a larger facility than that evaluated by the City of Roseville in 2002, would be expanded to provide needed stormwater volumetric retention for the net SAP and PRSP areas and is an essential feature of the project. Although other alternatives are available, conveyance of project-site stormwater to this future expanded facility would best meet project objectives.

The comment raises a question regarding the reason why the Pleasant Grove Retention Facility would not be subject to the SAP policies. The Pleasant Grove Retention Facility would be implemented by the City of Roseville and would be located within the City and outside the SAP area, which is located entirely within Placer County. Therefore, SAP policies cannot be applied to the Pleasant Grove Retention Facility because it is both outside the SAP area and outside the County's jurisdiction.

The comment suggests that use of Lakeview Farms would require installation of storm drains under Auburn Ravine. This is not correct. If Lakeview Farms is used, it would provide off-site retention capacity that would compensate for the increased peak stormwater associated with urban development, which would prevent downstream flooding. No physical connection between the project site and Lakeview Farms would be necessary.

The comment raises questions regarding funding for the Pleasant Grove Retention Facility and suggests that the project depends entirely on implementation of the Pleasant Grove Retention Facility. This is also incorrect. Chapter 3 of the Draft EIR, "Project Description," is clear in describing how the Pleasant Grove Retention Facility would be paid for and also the drainage options that would be implemented if the Pleasant Grove Retention Facility is not used to accommodate project retention needs. The full text of this discussion in the Draft EIR (from page 3-58) is provided below:

> To minimize impacts associated with increases in stormwater volume within the Pleasant Grove Creek watershed, retention is proposed to occur within the City of Roseville's proposed Pleasant Grove Retention Facility, which would be located on the Reason Farms property southwest of the SAP area along Pleasant Grove Creek. This approach would require a cooperative agreement between the City of Roseville and Placer County for basin

construction and maintenance paid through a fee collected by the County or County/City or an equivalent mechanism that fully funds the project. At such time that adequate funds have been collected, facilities would be constructed with sufficient capacity to meet the project's stormwater retention needs as well as larger, regional needs. If the City and County are unable to memorialize a joint retention facility agreement, construction of equivalent retention facilities, whether on-site or off-site elsewhere, would be required. (Note that this EIR assumes that Pleasant Grove Retention Facility would be used for off- site retention; if a different off-site facility is needed for retention in the Pleasant Grove Creek watershed, additional CEQA review would be required.) Lastly, interim on-site retention facilities may be implemented for various projects in the SAP and PRSP areas unless or until the Pleasant Grove Retention Facility is operational or other permanent equivalent facilities are available for retention.

52-15 The comment asks whether it is possible for the SAP and PRSP to meet stormwater regulation designed to prevent water quality impacts without the use of PGRF. As discussed in Impact 4.9-1, if the PGRF cannot accept stormwater from the PRSP area, either on a short-term or long-term basis, alternative stormwater retention locations are available. See response to comment 52-14 above.

52-16 The comment asks how long existing 100-year floodplain protections will remain viable in light of global climate change and rising sea levels. The 100-year floodplains in the SAP area are located along low-flow streams that are intermittent under natural conditions. Additionally, the SAP area is located 75–195 feet above mean sea level and is outside of the elevation range anticipated to experience direct effects from sea level rise.

52-17 The comment states that the SAP is mitigating the impact to freeway operations (Impact 4.14-10 of the Draft EIR) by providing incentives to build housing that will comply with Bus Rapid Transit compatible design. As described in Mitigation Measure 4.14-10, the proposed project would contribute its fair share toward feasible physical improvements to the state highway system, specifically SR 65 and I-80. The BRT compatible design items mentioned in the comment would facilitate transit use, which may help reduce traffic demand on the state highway system. However, the Draft EIR traffic analysis shows that physical improvements to SR 65 are also necessary to improve traffic operations (i.e., level of service).

The comment makes comparisons between the project and the CISGP regarding densities to support bus rapid transit. See Master Response 2: Citizen-Initiated Smart Growth Plan.

52-18 The comment summarizes the Draft EIR conclusion that Impact 4.12-1, population growth from new homes and businesses, would be significant and unavoidable, and further states that the CISGP would reduce this impact. Master Response 2: Citizen-Initiated Smart Growth Plan provides a detailed discussion regarding the CISGP. As indicated in the master response, implementing the CISGP would result in over four times more direct population growth than would occur under the SAP/PRSP and nearly three times more employment. The CISGP includes six times more residential units and double the amount of commercial/industrial floor area. The comment's suggestion that the CISGP would result in a reduction in impacts related to population growth is not accurate.

The comment then describes the "per household" reductions in air pollutant and GHG emissions that would be achieved under the CISGP. However, the comment does not address the total emissions, which would be much higher under the CISGP than under the SAP/PRSP. See Master Response 2: Citizen-Initiated Smart Growth Plan for more detail.

52-19 The comment erroneously claims that Impact 4.14-2 is less than significant and expresses disagreement with a less than significant finding. The Draft EIR identifies Impact 4.14-2 as a significant impact. The Draft EIR discloses that the project's impact at several locations would be significant and unavoidable in the short-term until applicable roadway network improvements are implemented. The project's contribution toward some of these improvements are reliant on an

update to the Placer County Countywide CIP and countywide traffic impact fee to cover these locations. The impact would be reduced to less than significant after the implementation of Mitigation Measures 4.14-2a through 4.14-2c and updates to the Placer County Countywide CIP and countywide traffic impact fee so that the project contributes its fair share toward the necessary improvements.

The comment also claims that the CISGP would reduce this impact by reducing vehicle mile trips (i.e., vehicle miles of travel or VMT). See Master Response 2: Citizen-Initiated Smart Growth Plan for additional information regarding the VMT generation of the CISGP compared to the Draft EIR impact analysis.

52-20 The comment is virtually the same as comment 52-19, above, with regards to Impacts 4.14-3, 4.14-4, 4.14-5, 4.14-6, 4.14-9, and 4.14-12 in the Draft EIR. See response to comment 52-19 and Master Response 2: Citizen-Initiated Smart Growth Plan for additional information regarding the VMT generation of the CISGP compared to the Draft EIR impact analysis.

52-21 The comment suggests that the Draft EIR disclose that funding for improvements to SR 65 and I-80 has not been identified. Mitigation Measure 4.14-10 in the Draft EIR acknowledges that the payment of impact fees, such as the Highway 65 JPA Fee and SPRTA Fee, only provide partial funding to the improvements to SR 65 and I-80.Therefore, the Draft EIR concludes that the project's impact is significant and unavoidable as shown on page 4.14-87.

52-22 The comment expresses disagreement with the project is consistent with the Placer County General Plan as stated in Impact 4.15-10. The comment provides references to the housing proposed by the project and the CISGP. The comment suggests that the Draft EIR be revised to expressly state that the housing units associated with Sac State—Placer Center would not be counted toward the number of required affordable housing units. Finally, the comment suggests that the Draft EIR be recirculated to allow public evaluation of the CISGP as the environmentally superior alternative.

Impact 4.15-10 of the Draft EIR evaluates consistency with general plan policies regarding utilities, not housing as may have been interpreted by the commenter. Impact 4.12-1 evaluated impacts related to population growth and noted that 10 percent of housing in the PRSP area would be affordable and that while the affordability of housing in the net SAP area is not yet know, development would be required to comply with the County's General Plan (see page 4.12-11). Affordable housing locations in the PRSP area are identified in new Exhibit 3-1 provided in response to comment 18-3.

See Master Response 8: Recirculation and Master Response 2: Citizen-Initiated Smart Growth Plan.

52-23 The comment expresses concern over the enforceability of the construction-related mitigation required under Impact 4.3-2 and then extends the concern to mitigation throughout the Draft EIR. The comment does not raise specific concerns related to the mitigation text. The Draft EIR identifies the agency responsible for monitoring and enforcing mitigation. Taking Mitigation Measure 4.3-2a, as an example, the text states that project proponents shall require their construction contractors to implement all of PCAPCD's recommended construction mitigation measures in place at the time of grading/improvement plan submittal. Therefore, the County is ultimately responsible for ensuring the measures are in place prior to approving the grading/improvement plans. However, individual measures specify that various components be submitted to PCAPCD; this is where PCAPCD would apply its recommendations identified in the stated text above.

Because the commenter does not identify specific issues with the mitigation measures, and because the Draft EIR clearly identifies monitoring and enforcement responsibility with respect to the mitigation measure that the commenter raises as an issue, no additional response is warranted.

52-24 The comment summarizes the Draft EIR conclusion that Impact 4.2-1, conversion of farmland to a nonagricultural use, would be significant and unavoidable. More specifically the comment indicates Mitigation Measures 4.2-1a and 4.2-1b, which require preservation of converted Farmland, are incomplete, inadequate, unenforceable. These issues are similar to the issues raised in comment 12-11. See response to comment 12-11 for a detailed response regarding this mitigation. It should be noted that some land preserved under the PCCP may qualify as Farmland; therefore, land protected pursuant to the PCCP for preservation of habitat, which also qualifies as Farmland, could count toward the mitigation requirements of Mitigation Measure 4.2-1a, given compliance with the other requirements identified in the mitigation measure.

The comment indicates that Mitigation Measure 4.2-1a does not define "substantial portion" with respect to land that is undeveloped. The mitigation measure leaves this determination to the County's agricultural commissioner. However, the intent of the phrase is to not eliminate Farmland from preservation when the land is undeveloped aside from structures appurtenant or accessory to the agricultural use (i.e., rural single-family homes, barns, sheds, etc.). The County's agricultural commissioner is qualified to make this determination. No revision to the Draft EIR is necessary.

Regarding the comment that the economic value of the "ecosystem services" provided by the farmland were not addressed in the Draft EIR, CEQA does not require the EIR to consider non-environmental issues, such as social or economic issues. No changes to the Draft EIR are required.

The comment also suggests that land preserved for habitat mitigation should not be counted toward Farmland mitigation because "land used for farming is generally not habitat." This is incorrect. Depending on the specific crop or function (i.e., grazing), Farmland may provide habitat for wildlife species including nesting habitat for western burrowing owl and foraging habitat for many species of raptors and other birds, including tricolored blackbird (*Agelaius tricolor*). Alfalfa, disked fields, fallow fields, and grain and hay crops, for example, tend to support large rodent populations and therefore provide good foraging habitat for Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), and more common raptors. Furthermore, to qualify as part of the preserve system under the PCCP, the land identified for preservation must meet criteria demonstrating it meets habitat requirements for covered species. The fact that a piece of land also meets the criteria for Farmland would not detract from its qualities as habitat for certain species.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan.

From: Daniel Ketchum <djketchum@gmail.com>
Sent: Thursday, February 21, 2019 5:59 PM
To: Shirlee Herrington
Subject: Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

Letter 53

February 21, 2019

Ms. Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

Dear Ms. Herrington:

Thank you for the opportunity to comment on the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. I ask that the DEIR be revised to include alternative plans to mitigate significant and unavoidable impacts upon public health. I also request the County consider alternative plans for this project that induces quality land use, transit and smart growth for the project and surrounding areas.

I have several concerns with the DEIR, including:

- Population Growth and Employment
  - A Sacramento State college campus is expected, along with a regional retail district. This will result in generally lower paying wage jobs that cannot support existing housing costs.
- Housing
  - Over 5000 low-density housing units are planned within 1000 feet of the Western Regional landfill. The impact of the landfill on these units is not fully mitigated in the DEIR.
- Traffic
  - A multi-lane expressway is planned which will greatly increase local traffic and worsening air quality in the area. Traffic on Hwy 65 is expected to exceed 800,000 new trips/day.
- Environment
  - The DEIR does not complete studies of the cumulative and undesirable impacts on several species of birds and reptiles, and does not fully address the effect of a loss of over 7,000 acres of farmland.
- Water Quality
  - Does not fully take into consideration the effect of water runoff downstream.

53-1

Thank you for the opportunity to provide comments on the DEIR. I would appreciate a written response.

Respectfully submitted,
Daniel Ketchum
2072 Devonport Loop
Roseville, CA. 95747

1

Letter 53	Daniel Ketchum February 21, 2019

53-1 The comment requests that the Draft EIR be revised to include alternative plans to mitigate significant and unavoidable impacts and to include alternatives to the project that induce quality land use, transit, and smart growth. Section 5.1, "Significant and Unavoidable Impacts," of the Draft EIR lists the project's significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. As to the comment about alternatives to the project, see Master Response 1: Alternatives Analysis.

The remainder of the comments expresses concern with the Draft EIR, including in the areas of population growth and employment, housing, traffic, biological resources, and water quality. These issues are addressed in their respective sections of the Draft EIR. More detailed responses are provided below for the detailed comments.

Regarding housing, the comment states that the impact of the landfill on the proposed housing units is not fully mitigated in the Draft EIR. This issue is addressed in Section 4.10, "Land Use," of the Draft EIR, under Impact 4.10-2. Mitigation Measure 4.10-2 would require odor control measures for specific plans; however, as described on page 4.10-18, the impact would be significant and unavoidable even after mitigation. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. The comment expresses concern related to the Draft EIR's conclusions but does not identify issues related to the *adequacy* of the Draft EIR's analysis or conclusions.

Regarding traffic, the comment indicates that the project would increase local traffic and worsen air quality. The commenter does not identify specific issues with the Draft EIR's analysis.

Regarding biological resources, the comment states that the Draft EIR does not address cumulative impacts on several species of birds and reptiles and does not address the loss of farmland. Impacts to biological resources are addressed in the Draft EIR in Section 4.4, "Biological Resources." The comment does not specify what species of birds and reptiles are not addressed; however, page 4.4-15 lists the species that were considered but eliminated from further evaluation. On this same page, the Draft EIR explains why these species were not evaluated further, including lack of suitable habitat in the project area or vicinity, limited range for the species that does not include the project area, and (specific to bird species) absence of nesting in the region and the species are of conservation concern only within their nesting range. Project-level impacts are evaluated under Impacts 4.4-1 through 4.4-10, and cumulative impacts are evaluated under Impacts 4.4-11 through 4.4-19. Loss of Farmland is addressed in the Draft EIR in Section 4.2, "Agricultural Resources," under Impact 4.2-1, conversion of Farmland to a nonagricultural use; as described therein, this impact would be significant and unavoidable even after mitigation. Contrary to the commenter's assertions, the Draft EIR does address the project's cumulative impacts on birds and reptiles and does address the loss of Farmland that would result from the project. No evidence is provided to the contrary in this comment.

Regarding water quality, the comment states that the Draft EIR does not fully take into consideration the effect of water runoff downstream. This issue is addressed in Section 4.9, "Hydrology and Water Quality," of the Draft EIR, under Impact 4.9-1, increased stormwater runoff and potential for downstream flooding. Mitigation Measures 4.9-1a and 4.9-1b would require the submittal of an improvement plan and final drainage report that provide details on how to achieve specific requirements related to stormwater runoff peak flows volumetric increases; however, as described on page 4.9-32, the impact would be significant and unavoidable even after mitigation. Contrary to the commenter's assertion, the Draft EIR does evaluate the project's downstream effects. No evidence is provided to the contrary in this comment. Note that County staff revised Mitigation Measure 4.9-1b as shown in response to comment 1-4 and in Chapter 2, "Revisions to the Draft EIR."

From: Lisa Larkin <lll@aceweb.com>
Sent: Thursday, February 21, 2019 4:46 PM
To: Shirlee Herrington
Subject: Re: Sunset Area Plan/Placer Ranch Specific Plan

Letter 54

Ms. Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
Email: sherring@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

Dear Ms. Herrington:

Thank you for the opportunity to review the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. Review is in accordance with the California Environmental Quality Act ("CEQA") and Public Resources Code, Section 21000, et.seq. CEQA requires the County address and fully mitigate the effects of the plan upon public health and natural resources, etc. It is noted the County used Ascent Environmental Company to gather data and methodology used in your Tables. However, upon further review, we find the DEIR reveals over 60 significant and unavoidable impacts in almost every category. Negative impacts will impose serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. (See Exhibit 1-2 Proposed PRSPLand Use Plan)

54-1

Population/Employment/Residential Impacts in Special Plan Areas:

The DEIR, a voluminous environmental draft document covers a dynamic area and will serve as a guide to growth of over 8,047 acres of land located in the western portions south Placer County. A specific plan, the Sunset Area (SA) Plan located within the City of Roseville and surrounding many existing neighborhoods where a future buildout of (yet undetermined) Sacramento State college campus is expected. The college campus combined with surrounding land uses projects an increase in student population of up to 30,000 students at buildout. A regional retail district is included in SA which is twice the size of the Galleria, Fountains, and adjacent box stores combined; and will compete with existing retail in Lincoln, Rocklin and Roseville. The inclusion of more retail will result in low paying wage jobs that will not support the costs of housing and accompanied lack of transit alternatives in this project will cause unwarranted vehicular congestion and negative impacts upon air quality. The DEIR offers no alternative transit opportunities for students and residents to ameliorate the negative and significant impacts of this project upon public health.

Housing alternatives are not fully mitigated in the DEIR. The location of SA area plan in Lincoln/Rocklin includes the addition of 5,636 low density housing units to be built within1000 feet of Western Regional sanitation plant/ Landfill facility with no adequate buffer from odor, nor mitigation to better the expected negative health consequences upon public. Landfill and Buffers: (See Land use 4.10.1) which allows residential developments close as 1000 feet and suspected odors will affect public health. According to the DEIR (Section 4.3-5), the Western Placer Waste Management Authority is actively engaged in yet incomplete studies concerning odors and mitigation of such the nature, and effectiveness of studies or strategies are as yet unknown, no quantifiable thresholds of significance for odor impacts is offered in the DEIR, and no existing fee program or other mechanisms is contemplated in order to fund the costs of odor mitigation in the DEIR. This impact would be significant upon the public health if not fully mitigated in the DEIR.

54-2

1

Transportation and Traffic and Air Quality Placer Parkway (PP):

A Multi-land expressway included in the plan offers no other transit alternative that reduces expected increase in CO2 emissions from increased vehicular traffic upon local project roadways. Such an increase in traffic will negatively affect air quality standards imposed by the California Air Resources Board (ARB) with no alternative transit mentioned in the DEIR. PP creates significant roadway construction and right of ways in the planning areas; noise, air quality are considered unavoidable and significant. Long-term emissions exceed maximum allowed under the ARB guidelines with no off-site mitigation plan and significant/unavoidable effects upon public health. Toxic air contaminants will exist within 500 feet of Hwy 65 which currently experiences up to 100,000 vehicle trips per day. Hwy 65 will be congested with at least 895,317 new daily vehicle trips per day (this does not include surrounding freeways I-80and I-50 which will connect to the proposed Placer Parkway). Significant negative impacts need to be fully mitigated to avoid serious impacts of bad air quality upon Placer residents.

54-3

Environment/Land:

The DEIR does not complete studies of the cumulative and undesirable impacts upon local species (reptiles, birds, migration, habitat, swainson hawk, etc.) no existing alternative no mitigation study fully addresses the effects upon the loss of 7,297 acres of farmland, species, fauna/flora, and vernal pools as per CEQA Guidelines section 15082(a) (1) will require specific mitigation studies not mentioned in the DEIR. The most significant effects are shown in Table 4.2-1 DEIR as farmland is proposed to be converted to non-ag use, a significant impact upon farmland production for the
Placer/SACOG region.

54-4

Water Quality:

In the DEIR, under the SAP and the PRSP Plan, storm water runoff from Auburn Ravine and Pleasant Grove Creek, all nearby watersheds lack a strong CEQA analysis on the impacts of water runoff downstream, including viable mitigation and unavoidable significant impacts of adjacent areas (unincorporated) outside of the county boundaries. Therefore, the DEIR is not taking into consideration the effects of the combined watersheds which may have a significant negative impacts upon water runoff in our Placer communities upon full buildout of the project plan areas.

54-5

I respectfully request the DEIR be revised to include alternative plans to mitigate significant and unavoidable impacts upon public health. I also request the County consider alternative plans for this project that induces quality land use, transit and smart growth for the project and surrounding areas. Please consider the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership. Please revise the DEIR and recirculate to the public for further review and consideration. Thank you for the opportunity to provide comments on the DEIR. Please provide your written response to the address stated below.

Extremely concerned citizen,



Signed: 2/21/2019
Lisa Larkin
21 Castle Hill Ct, Roseville, CA, 95678

Letter 54	Lisa Larkin February 21, 2019

54-1 The comment states that CEQA requires the County to address and fully mitigate the effects of the project on public health and natural resources, etc. This statement is inaccurate. Section 15126.4 of the State CEQA Guidelines describes the requirements related to mitigation measures, which specify that an EIR "shall describe feasible measures which could minimize significant adverse impacts." CEQA defines mitigation as avoiding an impact; minimizing effects to a degree; rectifying an impact through rehabilitation, restoration, etc.; reducing the impact over time by preservation and maintenance actions; or compensating for an impact by replacing or providing substitute resources (State CEQA Guidelines Section 15370). Further, the State CEQA Guidelines (Section 15126[b]) require that EIRs identify the significant environmental effects of a proposed project that cannot be reduced to a less-than-significant level (also termed significant and unavoidable impacts). See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. Thus, contrary to the commenter's assertion, CEQA does not require EIRs to fully mitigate project impacts, but rather to describe feasible mitigation to minimize significant impacts and identify those impacts that cannot be reduced to a less-than-significant level.

Mitigation measures are identified throughout the Draft EIR to reduce potentially significant and significant impacts (see Table 2-1 in the Executive Summary for a summary of the project's impacts and mitigation measures). Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable (see Section 5.1, "Significant and Unavoidable Impacts," of the Draft EIR, which lists the project's significant and unavoidable impacts). Therefore, the Draft EIR complies with CEQA requirements for mitigation measures.

The remainder of the comment expresses concern about the project's effects on public health, air quality, housing, wildlife, and the transportation system. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the adequacy of the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted. See responses to the detailed comments below.

54-2 The comment primarily describes the project details. Otherwise, the primary issues raised are wages associated with employment generated by the project, traffic congestion and associated air quality impacts, and impacts related to placing sensitive receptors near the landfill. Regarding the suggestion that the project would result in low wages, one of the primary objectives of the SAP is to create primary wage-earner jobs for nearby residents. However, this is not an environmental issue and does not require further response. Regarding the increase in traffic and associated air quality impacts, these issues are discussed in detail in the Draft EIR (Section 4.3 addresses air quality, and Section 4.14 addresses traffic impacts). The comment indicates that the Draft EIR does not identify alternative transit opportunities to reduce these impacts. However, the Draft EIR identifies several SAP policies that would require the project to contribute funding to local and regional transit agencies. These include the following measures:

- SAP Policy NR-7.4: Transit Funding, which states, "The County shall require new development to pay its fair share of the cost of transit facilities required to serve the new development;"
- SAP Policy TM-3.5: Transit Service, which states, "The County shall require fair share funding contributions by new development subject to discretionary review… for implementation of transit services to meet future demand;" and
- SAP Policy TM-3.1: Transit Service Planning, which states, "The County shall collaborate with neighboring transit agencies to update plans to include transit service to the Sunset Area… This

update would include a funding mechanism for the establishment and operation costs of transit service to the Sunset Area."

There are also mitigation measures included in the Draft EIR that require the project to contribute transit funding, including the following:

- Mitigation Measure 4.14-13a, which states, "The County shall prepare a transit master plan for the SAP area, including the PRSP area." This mitigation measure requires coordination with Placer County Transportation Planning Agency and Roseville Transit.

- Mitigation Measure 4.14-13b, which states that "a Community Service Area (CSA) Zone of Benefit (ZOB) shall be established by the project proponent, or the project proponent shall annex into an existing CSA ZOB to fund the cost of transit services proposed by the Transit Master Plan. This will include any related capital costs for buses, passenger amenities, and facilities."

Regarding the issue of placing residents near the landfill, See Master Response 4: Odors, which addresses these issues.

54-3 The comment asserts that Placer Parkway does not offer transit alternatives and would increase traffic and negatively affect air quality and noise. The comment asserts that long-term emissions exceed CARB guidelines and that toxic air contaminants will exist within 500 feet of SR 65. The comment also incorrectly asserts the project would result in an increase of 895,317 daily trips on SR 65.

See response to comment 4-25 regarding the previous environmental review that has been completed for Placer Parkway. This previous environmental review addressed the potential traffic, air quality, and noise impacts of Placer Parkway. Impact 4.14-13 of the Draft EIR describes the proposed project's transit impacts and acknowledges that a planned BRT route would provide service through the PRSP area and western Placer County. Policy TM-3.1 in the SAP commits the County to update its Long Range Transit Master Plan to include transit service to the SAP area and identify funding to establish and operate this service. Mitigation Measures 4.14-13a and 4.14-13b reinforce this commitment to plan for and provide transit service to the project.

The increase in daily vehicle trips on SR 65 cited in the comment is overstated. Table 4.14-35 on page 4.14-106 of the Draft EIR presents the daily trip generation at buildout of the SAP. This table shows that 561,635 daily trip ends are generated at buildout of the SAP. However, some of these trip ends would remain internal to the SAP area (i.e., begin and end within the SAP area). Therefore, the number of external trips would be less, and the amount using SR 65 would be only a portion of those external trips.

The comment also raises air quality concerns that correspond to the traffic concerns expressed. The Draft EIR evaluates impacts related to air quality (See Section 4.3), which uses traffic data provided from the Transportation Impact Study (included as Appendix M of the Draft EIR). The Transportation Impact Study is also used as the primary data source for evaluating traffic impacts (See Draft EIR Section 4.14). The Draft EIR's air quality analysis also specifically evaluates impacts related to health risk of sensitive receptors located near high—traffic-volume roadways (See Impact 4.3-5, "Exposure of sensitive receptors to TACs").

54-4 The comment states there is no alternative or mitigation to fully address impacts to farmland, local species of fauna and flora (e.g., reptiles, birds, migration, habitat, Swainson's hawk), and vernal pools.

Regarding the comment about loss of farmland, see responses to comments 12-11, 63-1, and 65-1.

See response to comment 52-11 for list of policies, programs, and mitigation measures provided in the Draft EIR to mitigate impacts on flora/fauna and wetlands, including vernal pools. The following mitigation measures are presented in the Draft EIR to address impacts on special-status species:

- Mitigation Measure 4.4-5a reduces potential impacts on western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird by requiring preconstruction surveys, avoidance of active nests, take avoidance, and compensation for loss of occupied habitats.
- Mitigation Measure 4.4-5b reduces potential impacts on northern harrier, white-tailed kite, and other nesting raptors by requiring preconstruction surveys and avoidance of active nests.
- Mitigation Measure 4.4-5c reduces potential impacts on loggerhead shrike, song sparrow, and grasshopper sparrow by requiring preconstruction surveys and avoidance of active nests.
- Mitigation Measure 4.4-5d reduces potential impacts on bat roosts by requiring preconstruction surveys and avoidance of active roosts.
- Mitigation Measure 4.4-5e reduces potential impacts on American badger by requiring preconstruction surveys and avoidance of active dens.
- Mitigation Measure 4.4-5f reduces potential impacts on special-status reptile, bird, and mammal species in off-site improvement areas by requiring coordination with the City of Roseville for appropriate mitigation.

As noted on page 4.4-64 of the Draft EIR, with implementation of these measures, the project would not substantially affect the distribution, breeding productivity, viability, or the regional population of any special-status reptile, bird, and mammal species. Therefore, potential impacts to special-status reptile, bird, and mammal species within the County's jurisdiction would be reduced to a less-than-significant level.

The Draft EIR contemplates Alternative 3: Reduced Footprint, Reduced Development Potential (Section 6.4.3 of the Draft EIR) and Alternative 4: Reduced Footprint, Similar Development Potential (Section 6.4.4 of the Draft EIR). Each of these alternatives would increase the amount of vernal pool core recovery area preserved by 1,467 acres compared to the proposed project and would therefore reduce impacts on local flora/fauna, vernal pools, and special-status species. See Draft EIR Chapter 6, "Alternatives."

54-5 The comment makes the claim that the Draft EIR does not appropriately consider the downstream effects of increased stormwater runoff. The Draft EIR assesses the potential for increased stormwater runoff and downstream flooding in Impact 4.9-1. The Draft EIR also includes an analysis of cumulative water quality impacts from urban land uses that considers the project contribution to water quality impacts in the context of the planned development in the vicinity. See Draft EIR page 4.9-47. For additional information, see Master Response 6: Drainage and Flooding, which provides additional detail related to the analysis of flood effects and potential downstream effects.

The comment also suggests that the County evaluate the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

From: Deanna Marsh <deanna@central-park-studio.com>
Sent: Thursday, February 21, 2019 9:41 AM
To: Shirlee Herrington
Subject: Placer Ranch DEIR comment

Letter 55

Dear Ms. Herrington:

I've been closely following the development of the Citizen Initiated Smart Growth Plan by AEL. I strongly urge our county to use it as a template for considering the future of our development opportunities. It is truly a structured analysis of 21st century ways of managing growth that will be healthier for Placer County.

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan revealed 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts to the public, create a jobs housing imbalance that will exacerbate the existing available housing crisis, put resident and migratory animal species at risk of extinction and jeopardize the planet with GHG. The DEIR is incomplete and inadequate because it fails to suggest, or properly analyze, an Alternative Project that that lessens adverse and unavoidable impacts to a less than significant level. The absence of such an Alternative does not allow the County to make an informed decision about the Project. I respectfully request that you recirculate the DEIR and that the Citizen Initiated Smart Growth Plan, created by the Alliance for Environmental Leadership, be analyzed as a Project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives, as set forth in the DEIR. 55-1

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Sincerely,

Deanna Marsh
3144 Manhattan Bar Rd., Auburn

Letter 55 Deanna Marsh, February 21, 2019

55-1 The comment summarizes and expresses concern about the project's significant and unavoidable impacts. These are also listed in Section 5.1, "Significant and Unavoidable Impacts," of the Draft EIR. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. The comment further states that the Draft EIR is incomplete and inadequate because it does not include an alternative that would reduce the project's significant and unavoidable impacts to less-than-significant levels. See Master Response 1: Alternatives Analysis. For the reasons described in that master response, the Draft EIR includes a reasonable range of alternatives, and the alternatives analysis is adequate.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative. Also see Master Response 8: Recirculation.

February 12, 2019

Letter 56

Chair and Members of the
Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator (sherring@placer.ca.gov)

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:
I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

Does not meet Objectives
In Placer Ranch Specific Plan Primary Objectives (6-3), the DIER states that, "development of the Placer Ranch community is designed to function as a stand-alone project *that is consistent with the goals and policies of the Sunset Area Plan*." Placer Ranch undermines several objectives of the Sunset Area Plan.

Retention of Unique Land Supply: Placer Ranch subdivides several of the largest parcels in the SA to create small single-family home parcels, the type of subdivisions that diminish long-term value and foreclose unique development opportunities. Changing the landfill buffer to accommodate Placer Ranch further undermines retaining the unique land supply, because the buffer staves off residential sprawl, which has many other opportunities of growth. 56-1

Housing Diversity: Placer Ranch fails to provide housing types not otherwise available by minimizing the amount of multifamily housing and maximizing the region's most common type- the single family home. Multifamily housing is a blanket term covering many building typologies, including mid-rise residential, garden apartments, standard and urban multifamily podiums, urban town-homes, live-work units, suburban town homes, condos and apartments. The little multifamily housing PR includes lacks diversity and promotes inequality by placing the farthest from the schools, closest to major road ways, and isolating it from other types in a way that will stigmatize it as a low income area. 56-2

Economic Innovation and Creativity: Placer Ranch does not support innovation or creativity, simply by creating unwalkable and disconnected communities. The business world acknowledges creativity and innovation coming from the "collision rate" or the amount of interactions possible to a single person while on a walk. The Walk Report in the CISGP gives the SAP a very low walkability score, meaning that people will be reliant on cars to get around, and thus isolated from each other. Only 9% of residences will be within a 15 minute walk to a job site, and only 30% will be within a 10 minute walk of restaurants, both an indicator of community social life. Please see the Walk Report analysis for the CISGP for an example of good walkability ratings. 56-3

Promotion of Active Transportation: The SAP, including PR, fail to fulfill the objective to accommodate walking for functional purposes. While they include complete street designs, the layout will not achieve active transportation because it does not place destinations within reasonable walking distance. Americans are willing to walk 15 minutes to get to school, get only 17% of residents will live within 15 minutes walking distance of school. Americans will walk 15 minutes to get a hospital, yet only 23% of residents will be within range. Americans will walk 10 minutes to get a restaurant, yet only 30% will be within range of one. Work commutes are even worse- only 9% of residents will be within a 15 minute walk of a job site. This problem stems from the zoning design and an analysis must be conducted to evaluate and provide reasonable certainty that active transportation is am attractive transportation option. 56-4

Placer Ranch also struggles to meet its own objectives.

Provide a Balanced Land Use Mix: The priority of Placer Ranch is low-density residential sprawl. All the additions are concessions to meet that end. As a result it does not meet this objective in good faith. In terms of land use per area, Placer Ranch is primarily residential, and with each new draft it increases its percentage of single family residential. The design creates the monoculture scenario we see in Roseville, where communities are designed around town centers or commercial areas, and the commercial area is never built out. Over time, the developer shrinks the commercial areas and builds more residences. In a nation wide study, the property taxes generated from suburbs were too low to support infrastructure maintenance costs over time, bring in only $0.06 - $0.65 per dollar needed. Placer Ranch does not establish reasonable confidence that it will financially support itself. A financial study and projection must be carried out to determine the financial burden put upon the county by the development. 56-5

Establish a site for a CSU: There have not been any feasibility studies done regarding the University's location or financial feasibility. Both must be completed before Placer Ranch can establish reasonable feasibility for the formation of a CSU. Merely donating the land does not fulfill the objective. The latest assessed land value for the parcel of which the CSU will be a subdivision was approximately $20 million, while the PCCP mitigation costs are upwards of $40 million. All of the 300 acres are a vernal pool complex, as seen on both the County's vernal pool map and the vernal pool study by Carol Witham and John Vollemar. In addition, the University site is virgin soil, requiring extensive soil engineering, and it is far away from existing utilities, requiring water, sewer, electricity and roads to extended to even reach the edge of the site. 56-6

Establish Open Space for Habitat Conservation-Habitat: Placer Ranch seeks to create on-site habitat conservation through open space corridors. These will not protect the biodiversity of the site and defy all scientific research about effective reserves in Placer County and research on grassland species habitat requirements. The research behind the PCCP found that reserves must be at least 200 acres and minimize the perimeter area in order to preserve habitat. The open space corridors in the PR are less than 200 acres and maximize the perimeter through the snaking corridor design. Grassland bird species in PR and SAP forsee the greatest habitat loss of all fauna, loosing 1,195 acres, according to the CISGP's Habitat Conservation Study, utilizing the Nature Conservancy's algorithms. Grassland birds are highly sensitive to changes in their habitat and the introduction of so much as a telephone pole will displace them. They require extensive acreage of grassland open space to flourish. Maintaining their habitat on site is impossible with the development objectives. Instead, the entire ecosystem of the SA will shift from grassland to urban-riparian corridor, the fauna of which have different habitat requirements. For further information, or to see an illustration of the species change, see the CISGP pages 74-77 and 98-101. **Any onsite habitat mitigation must be substantiated by scientific research specific to the grassland ecosystem on site in order to provide reasonable certainty of its success. Both PR and SAP must do this to properly disclose habitat impacts in the DIER and achieve their own objectives. In addition, a study must be done on how to improve riparian habitat on site for the incoming species, as well as address the impacts caused by raccoons and possums.** 56-7

Establish Open Space for Habitat Conservation- Drainage: PR does not provide the design detail required for evaluation or any corroborative research to prove with reasonable certainty the effectiveness of open space drainage plan. It fails to address the stream course setback, flood plain, stream width, stream order and meander amplitudes in its drainage design. Stream setback for vernal pool habitat in Western Placer County has been specifically studied in, "Setback Recommendations to Conserve Riparian Areas and Streams in Western Placer County" prepared for Placer County Planning Department by Jones & Stokes and PRBO Conservation Service in 2005. The study finds that1st and 2nd Order Streams must have setbacks of 98 ft. + floodplain and that 3rd Order and Higher Streams must have 656 ft. + floodplain. In the General Plan, Community Plans, of which PR is a part, can designate their own stream course setbacks. This is important for preserving natural drainage in the SA, because the General Plan stream setbacks are too small for vernal pool drainage systems. To see the distance and learn more about the setback problems and how to address them, please see the CISGP, pages 90-97. **An analysis must be done on the efficacy of the open space drainage plan to preserve natural drainage and quality and quantity of discharge throughout the year at the exist point from the project area. This study must include surface and sub-surface watershed analysis, as the loamy soil over hardpan acts as a slow-release sponge, an effect of which is vernal pools.** 56-8

Create a Fiscally-Responsible Plan: This objective has yet to be demonstrated by PR or SAP because the fiscal analysis has not been completed. **This must be completed and available for public review as a part of the CEQA disclosure.** 56-9

Foster Sustainable Community Design: Placer Ranch's approach to sustainability is a surface-level bandaid approach, similar to what you would see in a bare bones renovation of an existing community, and as such does nothing to advance long-term sustainability goals. It merely scratches the bare minimum required by law. To achieve this objective, Sustainable Community Design must begin at zoning level, where PR fails to follow the most basic principles of Smart Growth planning, despite calling itself a Smart Growth plan repetitively in it's Dec. 2018 draft. One example of this is that the PR area is 100% open space, while Smart Growth principles first rebuild existing development, then convert brown field sites, then urban infill of green lots, and at a last resort convert open space- not to mention the habitat and agricultural value of the open space Placer Ranch seeks to convert. The CISGP, also a smart growth plan, illustrates the ripple effect benefits of applying smart growth principles at the zoning level. As such it also reveals the opportunities the SAP misses by not addressing sustainability from in land use design. For example, the arrangement of dwelling units in the CISGP reduces annual household emissions by 75%, and water use throughout the plan area by 25%. **Placer Ranch must do a study to compare the impacts and benefits of their design against an average, up to code California Community to prove they are contributing to long-term sustainability.** 56-10

Reduce Reliance on the Automobile: There are no indications that Placer Ranch will achieve a reduction in independence on the automobile within its area or the surrounds. In addition to the walk report findings mentioned earlier (CISGP pg. 52), the bus route designed for the PR is a total joke, because it the zoning plan does not allow for the density required to provide the necessary ridership and funding for a reasonable and useful bus service. The support bus rapid transit, residents must live at a minimum density of 9 dwelling units / acre, of which only 12% of residents do. Non-residential uses must have a minimum FAR of 1.0 to have the employee head count to warrant a bus stop, which is 0% of PR. **Placer Ranch must do a study to prove that it can support alternative transit, including walking, biking and pubic transit.** 56-11

Enable Blueprint Consistency: Blueprint consistency starts at the land use level, especially since the Blueprint evaluates land use across the greater Sacramento Region. To see the SACOG vision blueprint for the project area, look at CISGP pg. 18-19. It does not include *any* low residential development in the SA. For the SA, it encourages industrial in the south-east with a low density mixed use zone. A large amount of the site remains open space and residential encroaches from the north and south. Since 2004, SACOG has tracked development in relation to the blueprint and created preferred build out scenarios. According to SACOG, single family small lot residential has been building out to capacity at an unanticipated fast rate. While the Blueprint is not intended to be used to determine use for any particular area, it's purpose is to guide land use in communities. There is no way that increasing the growth area for residential sprawl is in line with the blueprint. 56-12

Furthermore, PR treats itself as a stand-alone project, as specified in objective 2. It does not meaningfully interconnect with neighborhoods to its south, but rather merely extends the monoculture of roads and houses.

Falsely Represents Project through Inconsistent Numbers

Several of the figures in Table 6-1, Project Development at Buildout, are inconsistent with the figures in the SAP and PRSP drafts. This is of concern on two fronts, for either the project is misrepresented in the DEIR, or the SAP / PRSP drafts are inaccessible for public review.

1. It lists 2,460 du of Single-Family Residential in the Net SAP Area, yet there are 0 single family residential units in the SAP Plan Draft, for both January and December 2018 versions.
2. It lists 0 du of multifamily residential in the Net SAP Area, yet the housing typologies allowed in the EMU zone includes multifamily dwellings, single room occupancy units and live/work units (SAP Dec. 2018 Draft, pg 158). These two falsities not only falsely portray the distribution of different residential types, but also under represent the total amount of dwelling units by 1,307 (13% of total units). This is outside the realm of reasonable margin of error.
    a. In addition, the written description of the table is inconsistent with the values in the table, such as in the Population and Housing description where it lists 8,094 du instead of 8,096 du.
3. The breakdown of how much each of Retail, Office, Industrial, Innovation Center/R&D, and Entertainment Mixed Use categories take up in the Campus Park and the SAP are not disclosed in the PRSP Dec. 2018 Draft or the Sunset Area Plan Dec. 2018 Draft. Hence, they cannot be publicly verified for accuracy.
4. The accuracy of these values is unlikely, as calculating the square footage breakdown for SAP from the acreage and the FAR min and max creates a range of 30,330,076 to 123,089,670, a difference from the sum of the categories in the table potentially 5 fold.
5. According to PSRP Dec Draft, Public Facilities in the PRSP Area are 43 ac, not 10.3 ac as listed in the table. The total in the table leaves out the elementary school and middle school (32.7 ac).
6. The breakdown of parks/open space and preserve/mitigation areas is also falsely represented. In the PRSP Dec. 2018 draft Section 04-2, the 264.8 ac of Preserve/Mitigation Areas are designated open space, not mitigation.

56-13

Failure to Evaluate University Location

There are several glaring problems with the location of the university, firstly health/wellbeing and secondly fiscal responsibility. The university is located within the existing landfill buffer zone and odor will be a consistent and significant problem to the 35,000 people on campus. **How can the impact on these sensitive receptors be quantified?** Possibly through comparison with Elk Grove and the negative effects on residents who live near the waste water treatment plant.

The County's official vernal pool map shows the entire university site as vernal pools. The mitigation fees for the direct effects alone mitigated through the PCCP are more than $40 million. The last assessed value of the parcel the university would be a subdivision of was $20 million. In addition to the outrageous mitigation cost, other avoidable costs such as utility and infrastructure expansion to site and extensive soil engineering will be required. A longstanding notion that this is where the university should go cannot stand in for proper analysis. **As a public university funded with public dollars, a proper location study and financial feasibility study needs to be conducted.** For an example of another location within the SA for the university that avoids these costs, see the CISGP zoning plan. 56-14

Conflicting Vernal Pool Maps

The location of vernal pools effects all greenfield development in the SA. According to Greg Mackenzie, the county's vernal pool map has been made through aggregating many studies. Another map produced by respected vernal pool expert Carol Witham is the result of a study to map all remaining vernal pool habitats throughout the Central Valley in 2014. These two maps have substantial conflicts in the size, shape and density of vernal pool complexes in the SA. Both can be seen on page 108-109 of the CISGP with several differences pointed out. Here is the citation for the Witham map:

Witham, C.W., R.F. Holland and J.E. Vollmar. 2014. Changes in the Distribution of Great Valley Vernal Pool Habitats from 2005 to 2012. Sacramento, CA. Report prepared for the U.S. Fish and Wildlife Service and Bureau of Reclamation CVPIA Habitat Restoration Program under Grant Agreement No. F11AP00169 with the USFWS.

An onsite vernal pool study over the course of the year must be made for Placer Ranch at this time to effectively evaluate the impacts. Addressing it parcel by parcel after the subdivision has happened *piecemeals* the analysis. In addition, the two conflicting maps must be reconciled at this stage in order to adequately portray the existing conditions.

56-15

Placer Parkway as Traffic Mitigation

Placer Parkway has yet to secure funding to be built and it has also not completed its environmental impact review. As such, it is not a feasible traffic mitigation measure**. A suitable back up plan must be outlined and evaluated in the DIER, as well as the impacts of traffic on hwy 65 and local roads without Placer Parkway.**

56-16

Cumulative Impact *on* Expansive Soils

The soil in the SA is of special ecological value. The fluffy topsoil on top of hardpan holds in water through the dry months, slowly releasing its reserves into the creeks. Normal soil has large air pockets, called pores, that allow water and nutrients to move down to plant roots and the water table. Compaction squeezes the air out of the soil and reduces the size of pores, limiting water infiltration, increasing runoff, and decreasing the sponge effect. These factors change plant production and composition and the arrangement of organisms living in the soil within the compacted areas as well as adjacent normal soil areas.

To best protect the existing reserve areas and natural drainage, the natural water flow on top of and in the soil should be maintained and mimicked. Because the soil in the SA shrinks and expands, to prepare the soil for construction it will likely be scraped deeply and compacted with lime or other stabilizers to manufacture the desired structural properties. This requires specialty equipment of a very large size and to eliminate grading complexity, entire parcels will be compacted and shaped by deeply cut roads, drains and overflow ponds.

Such soil preparation is irreversible. We will never be able to tear up the pavement to return it to agriculture land or vernal pool grassland. **Runoff studies must include effects to the watershed, stream habitat quality, and plant life caused by changes in the subsurface water flow.** As percolation through the clay plan is minimal, ground water recharging for the SA happens in the creek beds and areas down stream. **Environmental impacts from stabilizers in the soil must be disclosed.**

In addition, the SAP reduces the above ground carbon stock by 973 metric tons and the soil carbon stock by 39,743 metric tons. Collectively that is 40,715 metric tons, the equivalent of 31,962 passenger vehicles driven per year. (See CISGP Carbon Report, pg 69.)

56-17

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

56-18

Sincerely,

Genevieve Marsh
3144 Manhattan Bar Rd., Auburn, CA 95603
916-316-8061

Letter 56 Genevieve Marsh, February 12, 2019

56-1 The comment suggests that the PRSP does not adhere to the SAP Unique Land Supply objective. The policy framework of the SAP is intended to support the implementation of the PRSP, which was, in turn, prepared to ensure consistency with the overall vision for development of the Sunset Area. The PRSP is designed as a planned community with varying types of residential uses, a university, job generating uses, and infrastructure development to support the SAP objectives. Page 4, Part 1, of the SAP notes as objective 8, notes as an objective to "Retain the large supply of large development sites in the Sunset Area by discouraging subdivisions that diminish long- term value and foreclose unique development opportunities." The PRSP implements this goal by master-planning 2,213 residential units under single ownership with varying uses, as noted above, that contribute to many of the other objectives and goals noted within the SAP.

56-2 The comment suggests that the PRSP lacks housing diversity. The PRSP includes residential uses that would support an array of housing types, including both single- family detached, and multi-family attached units. This includes areas for age-restricted neighborhoods as well as housing in mixed-use environment within the Town Center. In addition, high-density residential units would be permitted on Commercial Mixed-Use parcels in the Town Center district. Conversely, consistent with the concept of a mixed-use urban core, ground-level commercial uses would be permitted on high-density residential parcels north of Sunset Boulevard, particularly along Town Center Lane. Residential densities greater than 2 dwelling units per acre would be encouraged in the Town Center as well. This approach provides for a diverse mix and range of housing uses within the PRSP area.

56-3 The comment suggests that the PRSP creates unwalkable and disconnected communities. The PRSP is designed to create several distinct neighborhoods, visually cohesive and connected by a system of trails for bicyclists and pedestrians. The proposed PRSP mobility system would provide residents, student, and employees multiple options to move through the community. The PRSP also includes a network of street separated shared use paths, Class II bike lanes, public transit, and roadways into a single, comprehensive system. This network also includes linkages to existing/planned bikeways located in the City of Roseville, south of the PRSP area.

56-4 The comment asserts that the project fails to fulfill the objective to accommodate walking and that the project's street designs and zoning do not achieve active transportation and walkability. With regard to the project's street design not achieving transportation and walkability, the Draft EIR Exhibit 3-8 (SAP Mobility Map) and Exhibit 3-17 (PRSP Mobility Plan) include Shared Use Paths, intended to serve pedestrians and proved for walkability. These Shared Use Paths are planned along most all of the roadways within the PRSP area. In addition, for all other existing future roadways within the project area, the SAP Corridor Design Standards and Guidelines contained in Appendix A, and the PRSP Mobility Plan contained in Section 7, include provisions that require sidewalk facilities to be constructed to facilitate walkability. Regarding the project's zoning not achieving active transportation, all zone districts in which development is anticipated include streetscapes that provide Shared Use Paths and sidewalk requirements to achieve active transportation. In addition, the SAP Commercial and Entertainment Mixed Use Zones (Chapter 1.01), Research and Development Zones (Chapter 1.02) and Industrial Zones (Chapter 1.03) all include allowances for a mix of uses that would include commercial, office, and housing uses. In addition, the PRSP also allows for a mix of uses, including residential, commercial, and office uses within its commercial and campus park zones, and allows for neighborhood serving commercial uses within its residential zones. The mix of uses and zone district design in the net SAP and PRSP areas is intended to provide a balance of uses aimed to achieve pedestrian friendly design and to achieve active transportation.

56-5 The comment suggests that the PRSP does not provide a diverse mix of land uses and a financial study should be carried out to determine the financial burden put upon the County by the development. See response to comment 56-2, above, regarding diversification of residential uses. In addition, the PRSP is planned for approximately 5.5 million square feet of non-residential uses as well as a university to serve the higher education needs of Placer County. Page 10-4 of the PRSP notes that a financing plan has been prepared for the PRSP that outlines the cost for all backbone infrastructure needed to serve the different development phases and include a plan with funding mechanisms, to construct the public facilities within the PRSP area. The Specific Plan pages 10-6 to 10-7 note the mechanisms in which maintenance obligations and service level increases may be funded.

56-6 The comment suggests that feasibility studies have not been done regarding the University's location or financial feasibility. A market study was prepared by EPS for the PRSP and SAP. The study included the University site and did not conclude that the PRSP would be financially infeasible. Furthermore, the PRSP included several utilities master plans, including water, recycled water, wastewater, and dry utilities. An urban water supply assessment was also provided by PCWA confirming that water supply is available to serve the project. Also, the suggestion that the PCCP

mitigation cost $40 million is inaccurate. See Master Response 3: Placer County Conservation Program and Mitigation for a detailed discussion about the PCCP. Also see Master Response 2: Citizen-Initiated Smart Growth Plan, specifically the discussion under "Wetlands Impacts" related to fee calculation methods. Infrastructure has been planned and sized to accommodate the university. As each subdivision develops, appropriately sized infrastructure will be stubbed and sized to accommodate future university needs.

56-7 The comment states that the open space corridors proposed under the PRSP would not protect the biodiversity of the site and are inconsistent with the research behind the PCCP regarding effective reserves in Placer County. The comment further states that on-site habitat mitigation must be supported by scientific research and study. See Master Response 3: Placer County Conservation Program and Mitigation, which provides an overview of the PCCP, explains the current status, and provides additional details regarding the PCCP's effectiveness as a mitigation tool and the Draft EIR's mitigation approach.

The Draft EIR does not claim that PRSP Open Space Preserves would preserve vernal pool complexes or grasslands and does not propose them as PCCP reserves. Only the existing conservation reserves and adjacent proposed reserve acquisition areas in the northern portion of the SAP area are considered as PCCP reserves. The PRSP Open Space Reserves are designed to preserve riverine/riparian complex land cover, or stream system habitat consistent with SAP Policies NR-1.2, NR-3.4, and NR-4.1. Mitigation is proposed to compensate for the loss of vernal pool complexes and annual grassland either through participation in the PCCP or Mitigation Measures 4.4-1a, 4.4-3b, and 4.4-5a. Per the comment, "introduction of so much as a telephone pole" would displace all grassland birds; therefore, using this rationale, the CISGP would displace these species in a similar fashion as the project. The Draft EIR does not suggest that the project would maintain grassland habitat in the PRSP area and that is why compensatory mitigation is necessary. See also Master Response 2: Citizen-Initiated Smart Growth Plan.

56-8 The comment states that the PRSP does not provide the necessary level of detail for evaluation or corroboration of the effectiveness of the open space drainage plan. The comment further states that the General Plan stream setbacks are too small for vernal pool systems, and a surface and sub-surface watershed analysis is necessary.

Under the PCCP's definition of a Stream System, the segment of stream within the PRSP area would be defined by its stream channel and a 50-foot setback on both streambanks from the stream's ordinary high water mark. Any covered activity that impacts this Stream System requires authorization under the CARP, which is an element of the PCCP. If avoidance of the Stream System cannot be achieved, the direct and indirect impacts of a covered activity trigger a base land cover fee and the Stream System fee that takes into consideration the affected habitat types. Further, the activity is subject to notification under California Fish and Game Code Section 1602 (Streambed Alteration).

Vernal pool constituent habitat is defined by the PCCP as the vernal pool and its immediate watershed—an area encompassing the pool and extending outward from the wetted perimeter of the pool to a distance of 250 feet. Under the PCCP, any determination that the immediate watershed is smaller than the 250-foot perimeter must be supported by an analysis conducted by a qualified professional and approved by the reviewing Permittee in consultation with the Placer Conservation Authority (the PCCP's Joint Powers Authority). Given that the PCCP framework addresses impacts to streams and vernal pools on a regional scale, with PCCP approval, an individual project would not require a surface and sub-surface watershed analysis, nor would the 2005 Setback Recommendations to Conserve Riparian Areas and Streams in Western Placer County apply.

For a discussion of mitigation that would be required if the PCCP is not approved, see Master Response 3: Placer County Conservation Program and Mitigation.

56-9 The comment states that a fiscal analysis has not been completed and that it must be completed and made available as part of the CEQA process. This is incorrect. CEQA requires lead agencies to consider the environmental impacts resulting from proposed projects; it does not require lead agencies to consider social or economic impacts, except to the extent that those impacts cause adverse effects to the environment. Therefore, CEQA does not require a fiscal analysis to be prepared. However, a market study was prepared by EPS for the PRSP and SAP and was available for public review on the County's website at the time the Draft EIR was released. Service impacts are analyzed and noted in Section 4.13, "Public Services," of the Draft EIR. A finance plan has been prepared for the PRSP and will be released to the public and available for the Board of Supervisor's consideration.

56-10 The comment suggests that the PRSP is inconsistent with its stated objective to foster sustainable community design. As noted in the Section 1 of the PRSP, the objective states that the project would incorporate design and construction measures that reduce energy usage, conserve water, incorporate water efficient landscaping, treat stormwater, and reduce automobile reliance. The PRSP's Utilities plan (Section 9) and Design Guidelines (Sections 2 and 6) include various requirements for future development in the PRSP area, which collectively address this objective. Through implementation of the PRSP, future development projects would be required to: (1) reduce water usage through measures such as turf reduction and recirculating hot water systems; (2) install landscaping that complies with Placer County's adopted Model Water Efficient Landscape Ordinance in order to reduce water use; (3) manage stormwater by including source control measures, site design measures, and hydromodification treatment features to reduce pollutants in stormwater and to reduce the quantity of runoff from a developed site; and (4) incorporate a mixed-use Town Center district with high-intensity non-residential uses and high-density residential uses in order to reduce automobile reliance by siting residential, employment, and service uses within walkable proximity to one another. As designed, the PRSP includes design features and implementation mechanisms that achieve its objective regarding sustainable community design.

Regarding the suggestion that the CISGP be reviewed for comparison, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible for several reasons including especially lack of market support for the high-density products and constraints associated with developing a university on existing, privately-owned-and-operated industrial development. The master response also describes that CISGP would not meet primary project objectives and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative.

56-11 The comment asserts that the PRSP would not reduce automobile dependence and that the proposed densities in the PRSP area would not be sufficient to support bus rapid transit. The comment requests that a study demonstrate that the PRSP would support transit, walking, and biking. The Draft EIR and the proposed project acknowledge that a planned BRT route would provide service through the PRSP area and western Placer County. Policy TM-3.1 in the SAP commits the County to update its Long Range Transit Master Plan to include transit service to the SAP area and identify funding to establish and operate this service. Mitigation Measures 4.14-13a commits the County to preparing a transit master plan for the net SAP and PRSP areas (i.e., a study to demonstrate how transit service would be provided in the PRSP).

56-12 The comment suggests that the PRSP is inconsistent with its stated objective to enable Blueprint consistency, per SACOG's vision. This issue is discussed in detail in Master Response 2: Citizen-Initiated Smart Growth Plan.

56-13 The comment indicates that there are six areas where the numbers listed in Table 6-1 in the Draft EIR are inconsistent with the numbers in the draft SAP and PRSP documents. A response to each of these six areas are provided below:

1. The comment notes that Table 6-1 in the Draft EIR assumes no multi-family residential development in the net SAP. This omission was made in error. See response to comment 31-10 for the corrected table.

2. The comment points out a discrepancy related to the total unit count for the project where 8,094 is referenced in one area of the Draft EIR and 8,096 is noted in another. The total unit count is 8,094 dwelling units. Table 6-1 has been revised as shown in Chapter 2, "Revisions to the Draft EIR."

3. The comment states that the PRSP and SAP do not disclose the breakdown of Retail, Office, Industrial, Innovation Center/R&D, and EMU uses within the Campus Park and SAP. Both the SAP and the PRSP include a land use summary and the associated development potential and intensity of each use. However, the SAP and the PRSP provide this information in a different manner. The SAP is an Area Plan or Community Plan and a component of the County General Plan, and as such, expresses land use development potential in terms of floor area ratio (FAR). The PRSP is a Specific Plan, and as an implementing mechanism of the County General Plan, it includes greater specificity regarding the allocation of planned residential units and non-residential square footage to Specific Plan parcels. While the PRSP's land use development potential is expressed in terms of FAR, it also provides parcel-specific development assumptions that align with each land use's FAR range. Due to the differences in the purpose and requirements of each plan, the SAP's development potential is necessarily more general than that of the PRSP.

   The SAP's buildout information contained in the EIR provides a reasonably-anticipated, high-level assumption of each land use's buildout potential, which is consistent with the SAP's allowable FAR range. The PRSP's buildout information contained in the EIR also provides a reasonably-anticipated, high-level assumption of each land use's buildout potential, but with greater specificity, which is appropriate for a specific plan project. Table 4-2 of the PRSP provides a parcel-specific breakdown of the square footage assumptions that can be accommodated on each of the PRSP's General Commercial (GC), Commercial Mixed Use (CMU), and Campus Park (CP) parcels. For each of these land use designations, the PRSP's Land Use section also describes the mix of uses that each designation can accommodate, including the total square footage at an assumed FAR. Furthermore, the PRSP's Community Employment section provides a specific breakdown of the square footage that can be supported in the Campus Park land use, which allows for a mixture of Professional Office, Research & Development, Commercial, Light Industrial, and Warehouse uses, including an estimate for each. The square footages listed in the PRSP align with those listed in Table 6-1 of the Draft EIR.

4. The comment states that the accuracy of the values in Table 6-1 is unlikely but does not specify what values are being referred to and is unclear. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration.

5. The comment states that the PRSP provides 43 acres of Public Facilities, not 10.3 acres as listed in Table 6-1 of the Draft EIR. Table 4-1 in the PRSP distinguishes between public facility sites for County-related project features (totaling 10.3 acres) and those for schools (totaling 32.7 acres). The PRSP includes eight sites for County public facilities - 10.3 total acres for water storage tanks, pump stations electric facilities, etc. The PRSP also identifies sites for two schools, which total 32.7 acres. The Public Facilities line item in Table 6-1 of the Draft EIR does not include school sites, only County public facilities. This distinction in the Draft EIR is intentional. These are two types of public facilities, which constitute different uses of land, which are evaluated

individually by the Draft EIR. Because both the PRSP document and the Draft EIR recognize that the PRSP includes 10.3 total acres for County public facilities, the PRSP and Draft EIR are consistent with one another in each document's representation public facilities.

6. The comment states that the amount of parks/open space and preserve/mitigation areas listed in the Draft EIR does not align with the PRSP. For these types of features in the PRSP, the land use designations include Parks & Recreation (PR) and Open Space (OS). The PRSP's land use section indicates that the PR designation is for the development of active parks and that the OS designation accommodates both paseos and preserves. The SAP also includes land use designations for parks and open space features, and while the function of each land use is similar to the PRSP, although the title of each designation is slightly different. The Draft EIR, in its evaluation of both the PRSP and the SAP, combines similar land uses into single line items in its summary tables. This means that the title of each land use designation is slightly different, but the function of each land use is similar. Table 4-1 in the PRSP states that 69.8 acres of PR and 264.8 acres of OS are provided in the PRSP. Table 6-1 in the EIR states that 69.8 acres of Parks/Open Space and 264.8 acres of Preserve/Mitigation are provided in the PRSP. While the EIR uses, for purposes of equivalent comparison, a slightly different vernacular to describe each park and open space land use designation, the acreage numbers identified in the Draft EIR are consistent with the equivalent land use designations listed in the PRSP and SAP.

56-14 The comment raises environmental issues, but only in the context of the costs to mitigate those impact and the effects of those costs on financial viability of the university portion of the project, as well as public disclosure of those costs. The comment states the EIR does not evaluate the university location. The university is included as part of the Project Description and its associated impacts are analyzed throughout the Draft EIR as part of the PRSP, but at a programmatic level. See Master Response 7: Program- vs. Project-Level Analysis. See responses to comments 56-6 and 56-9, above, regarding analysis of fiscal impacts.

56-15 The comment indicates that an "onsite vernal pool study" must be prepared for the PRSP and that addressing the impact "parcel by parcel" after the subdivision would be considered piecemealing the analysis. The comment offers an additional vernal pool study to consider. As described in the "Methods and Approach" discussion in Section 4.4 of the Draft EIR, "Biological Resources," the analysis of impacts associated with the PRSP included project level mapping of habitat types and aquatic resources delineation completed according to USACE methodologies, which was verified and concurred by USACE on March 25, 2015. Because an on-site wetland delineation has been performed for the PRSP and has been verified and concurred by the USACE, no further vernal pool study is required. It should be noted that the USACE's concurrence occurred in 2015, which is more recent than the 2014 study identified by the commenter.

56-16 The comment asserts that Placer Parkway has not secured funding for construction and has not completed its environmental review. The comment asserts that it is not a feasible mitigation measure for these reasons and suggests a back-up plan be identified. The Draft EIR analysis considers the project's impact on traffic operations using the existing roadway network, which does not include Placer Parkway, in Impacts 4.14-1 through 4.14-12. Therefore, the Draft EIR already discloses the impacts of the project without Placer Parkway in place.

As described on page 4.14-50 of the Draft EIR, the County is in the final design stage for Phase I of Placer Parkway, which was analyzed independently by Placer County Department of Public Works and has received both NEPA and CEQA clearance. As described on page 4.14-50 of the Draft EIR, project proponents in the PRSP area would pay the applicable Tier II Placer Parkway fees, while development in both the PRSP and net SAP areas would pay the applicable SPRTA fees. These fees combined with fees collected from development in other growth areas subject to the Tier II and SPRTA fees would provide partial funding for Placer Parkway. Placer Parkway is also included in the SACOG 2036 MTP/SCS financially constrained project list. Therefore, it is considered a reasonably foreseeable project, and is suitable to include in the mitigation analysis.

56-17 The comment suggests that development within the net SAP and PRSP areas would include broadscale site preparation and soil stabilization for entire parcels, including those identified for retention as natural areas, ultimately affecting groundwater recharge rates and water movement in the soil profile. As discussed in Section 4.9.4 of the Draft EIR, the SAP goals and policies include many standards for preservation of natural areas and open space: Policy NR-1.2 requires the protection and enhancement of certain natural areas including stream corridors and valley oak woodlands; Policy NR-1.3 requires that the County permanently protect as open space areas of natural resource values including wetlands, riparian corridors, woodlands, and floodplains; Policy NR-3.2 requires that stream corridors be preserved in open, natural condition; and Policy PFS-5.1 requires that natural drainage systems be identified at the earliest stages of planning. These strong protections for natural areas would ensure that ground disturbance in these areas is avoided or minimized. Additionally, the type of site preparation described by the commenter would dramatically alter the natural community and would directly conflict with these policies. Because the natural stream corridors would remain intact, they would continue to serve as groundwater recharge areas even after the proposed development of the site.

The comment also suggests that the County evaluate the CISGP as an alternative. See Master Response 2: Citizen-Initiated Smart Growth Plan.

56-18 Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan.

From: Lorraine Marsh <lorraine@central-park-studio.com>
Sent: Monday, February 18, 2019 5:33 PM
To: Shirlee Herrington
Subject: Sunset Industrial Area Site Plan

Letter 57

Dear Ms. Harrington,

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan revealed significant impacts to the environment that cannot be mitigated. Because of the Projects egregious environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative.

If the Board determines to pursue the project, the Draft EIR must be recirculated because it fails to adequately analyze environmental impacts and is incomplete.

I respectfully request that as you recirculate the DEIR, that the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed as a Project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives as set forth in the DEIR.

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

57-1

Respectfully,
Lorraine Marsh

Letter 57 Lorraine Marsh, February 18, 2019

57-1 This comment letter is virtually the same as the content of comment letter 23. Therefore, this response simply cross-references to responses to this letter. See response to comment 23-1.

From: PAM & TOM MENCONI <tpmenconi@gmail.com>
Sent: Tuesday, February 19, 2019 9:35 PM
To: Shirlee Herrington
Subject: No Project

Letter 58

The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan. revealed significant impacts to the environment that cannot be mitigated. Because of the Projects egregious environmental impacts, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative.

If the Board determines to pursue the project, the Draft EIR must be recirculated because it fails to adequately analyze environmental impacts and is incomplete.

I respectfully request that as you recirculate the DEIR, that the Citizen Initiated Smart Growth Plan created by the ***Alliance for Environmental Leadership*** *be analyzed as a Project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives as set forth in the DEIR.*

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County."

58-1

Respectfully

Pam & Tom Menconi

Letter 58 Pam and Tom Menconi
February 19, 2019

58-1 This comment letter is virtually the same as the content of comment letter 23. Therefore, this response simply cross-references to responses to this letter. See response to comment 23-1.

Subject: FW: Question about EIR

Letter 59

From: Crystal Jacobsen
Sent: Tuesday, January 29, 2019 9:21 AM
To: lorettakmoreno@yahoo.com
Cc: Shirlee Herrington; Leigh Chavez
Subject: RE: Question about EIR

Hi Loretta,

Thanks for your email. The Draft EIR is set up so that the PCCP is an option for mitigation; it was done this way because the PCCP is not yet adopted. So if PCCP adopted, then the project may mitigate thru the PCCP, and if the PCCP is not adopted, the Draft EIR also identifies traditional mitigation practices that would be implemented.

Thanks,
Crystal

Crystal Jacobsen | Principal Planner, Advanced Planning
Placer County Community Development Resource Agency
Planning Services Division
3091 County Center Drive Ste. 140, Auburn, CA 95603
530.745.3000 (main) | 530.745.3085 (direct) | 530.745.3080 (fax)| cjacobse@placer.ca.gov

From: lorettakmoreno@yahoo.com [mailto:lorettakmoreno@yahoo.com]
Sent: Tuesday, January 29, 2019 8:22 AM
To: Crystal Jacobsen <CJacobse@placer.ca.gov>
Subject: Question about EIR

Dear Crystal,

I am writing regarding the Sunset Area Plan and Placer Ranch Specific Plan EIR. I called you yesterday but I thought it was better to write.

My question is, given that the PCCP is not yet approved and adopted, how can mitigation measures in the EIR suggest they will use the PCCP? As I know you are aware CEQA does not allow the promise of future action associated with mitigation measures that are currently not feasible because the PCCP does not officially exist. I ask you now because I'm sure there is some explanation for this. 59-1

Thank you for letting me know as soon as possible,

Loretta

Letter 59	Loretta Moreno January 29, 2019

59-1 The comment suggests that mitigation measures related to the PCCP to mitigate biological impacts is not feasible because the PCCP is not an adopted County document. The Draft EIR identifies two mitigation options for mitigating biological impacts in Section 4.4, "Biological Resources." As noted in Mitigation Measures 4.4-1a, 4.4-3b, 4.4-4a, 4.4-5a, 4.4-6a, 4.4-7a, and 4.4-8b, the project can mitigate through the PCCP, if adopted, or it can mitigate through traditional biological impact mitigation practices if the PCCP is not adopted. See Master Response 3: Placer County Conservation Program and Mitigation for a detailed discussion.

February 21, 2019

Letter 60

Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
Email: sherring@placer.ca.gov

Re: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report (State Clearinghouse No. 2016112012)

Dear Ms. Herrington:

This comment letter seeks to address the Sunset Area Plan/Placer Ranch Specific Plan (Project) and its associated Draft Environmental Impact Report (DEIR). My comments are intended to ensure that any development in the Sunset Area provides maximal protection of the site's unique environmental resources, including extensive vernal pool and riparian habitat, and addresses the existing community's needs and concerns. This development's impacts will remain for centuries to come, and development should be done with the utmost care, rather than business-as-usual development most reflective of the abysmal, congested, sprawling LA style of development where no one benefits.

The proposed project and currently proposed alternatives fail to comply with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq. The DEIR violates CEQA because it fails to identify an alternative that would substantially reduce or eliminate even one of the Project's significant and unavoidable impacts. Significant health, safety and quality of life impacts to the public will occur as a result of poorly planned development including the proposal to locate residential development proximate to the landfill, and significant congestion to local and regional roadways. The jobs-housing imbalance will be exacerbated given the existing housing crisis which was not adequately mitigated for. Further, flora and fauna species receive little to no relief under a development scenario and associated mitigation measures that do not do enough to minimize and avoid impacts (e.g. to wetlands and native species). CEQA requires environmental impacts be avoided and minimized where feasible. 60-1

There are countless alternative ways that the County and developer can meet their development goals and objectives while reducing the environmental toll/footprint on the landscape. The Alliance for Environmental Leadership (AEL) has engaged with the

community to produce a Citizen-Initiated Smart Growth Plan[1] that fundamentally reimagines future development for the area. Given the alternatives the County put forth fail to adequately avoid and reduce environmental impacts across impact areas, CEQA requires that the County evaluate this proposed alternative in a revised and recirculated DEIR.

Once again, the County fails to adequately provide alternatives to the proposed project, and fails to adequately minimize impacts. Especially in the case of biological resources. When avoidance of impacts is possible, the County should absolutely require the developer to redesign to ensure the very best development outcomes for Placer County. Mitigating offsite for onsite impacts should only be done when there are no alternatives onsite.

Placer County should be a county that wins all around, not just benefitting the few. Short-sighted development plans, cookie-cutter development with no thought given to drawing from and working with the natural environment onsite, should not be the future of Placer County. Simply drive down towards the Bay Area, or Los Angeles, and you see short-sighted, anywhere-America development that benefits no one in the long run. Please do better Placer County. We can have it all with better design (AEL's proposed alternative).

60-1 cont.

Thank you for your consideration.

Sincerely,

Lorie Moreno
541-786-0330

[1] The Smart Growth Plan was submitted under separate cover from AEL, but is incorporated by reference into this comment letter.

Letter 60	Lorie Moreno February 21, 2019

60-1 The comment provides an opinion regarding the merits or qualities of the project and does not address the content, analysis, or conclusions in the Draft EIR. The Placer County Planning Commission and Board of Supervisors will take the commenter's opinions regarding the merits or qualities of the project into consideration when making a decision regarding the project.

The comment also states the Draft EIR violates CEQA because it does not include an alternative that would reduce the project's significant and unavoidable impacts. See Master Response 1: Alternatives Analysis. For the reasons described in that master response, the Draft EIR includes a reasonable range of alternatives, and the alternatives analysis is adequate.

The comment expresses concern about the project's significant impacts in the areas of health and safety, quality of life, traffic congestion, jobs-housing balance, and biological resources. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the adequacy of the content, analysis, or conclusions in the Draft EIR are raised in this comment. Regarding CEQA requirements for mitigation measures, see response to comment 54-1.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative. Also see Master Response 8: Recirculation.

Finally, the comment states that the Draft EIR does not adequately minimize impacts, especially for biological resources. Section 4.4, "Biological Resources," of the Draft EIR describes the project's potential impacts related to biological resources and identifies mitigation measures to reduce significant and potentially significant impacts. Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable. The comment does not provide reasons specifying why the mitigation measures for biological resources are inadequate. Therefore, a response is not warranted.

February 14, 2019
Placer County Planning Commission
Sunset Area DEIR review

Letter 61

Technical flaws and deficiencies

4.10-8
Policy 4.G.11
"When considering land use changes in the vicinity of a landfill operation, the County shall consider the landfill as the DOMINANT LAND USE IN THE AREA. In order to PROTECT THESE FACILITIES from INCOMPATIBLE encroachment, new residential land uses shall be separated from the property lines of active and future landfill sites by a buffer of ONE MILE." 61-1

4.10-14
"Amendment to reduce buffer from 5,280 feet to 2,000 feet for residential development with the possibility of allowance within 1,000 feet. Resulting in land use INCOMPATIBILITY due to residential development occurring closer to the facility. It is expected that new residents and users within the project area would complain about odor from the landfill and that the number of complaints lodged about nuisance odors would increase. Such complaints could create pressure for the landfill to implement additional odor control and reduction measures at the facility and absent measures to control odors at the source could interfere with the ability of the landfill to expand or modify needed operations. Impacts relative to consistency and COMPATIBILITY of the proposed land uses with the landfill would be POTENTIALLY SIGNIFICANT." 61-2

4.10-15
"Placer County Air Pollution Control District Handbook recommends a one mile buffer around the landfill. The stated purpose of this buffer is to protect the landfill from INCOMPATIBLE encroachment ."

"The landfill is an important and valuable County asset with substantial capacity and permitted to provide many more years of permitted service, the intent of the buffer and other landfill related policies in the General Plan was to separate potentially INCOMPATIBLE uses, protect the landfill, and protect new uses from nuisances. Residential encroachment could create pressures on the landfill 61-3

operations, resulting in the need to entertain other solutions: diverting waste to another facility, which could be costly and could result in environmental impacts; or siting a new landfill, which would likely be infeasible given cost, timing, and regulatory considerations. Complaints directed at the landfill have been received from residents more than 2 miles away, primarily about odors."

"It is likely that residential development ANYWHERE in the Placer Ranch Specific Plan area would be subject to odor from the landfill. Some or many future residents and users could find the odor objectionable. If the less restrictive buffer amendment is implemented with residential development closer to the landfill, it would result in an INCOMPATIBLE use with the landfill."

61-3 cont.

4.10-16

"Odor complains about the landfill could result in enforcement action and/or implementation of additional odor controls."

Comparing other landfills to the one in Placer County is meaningless. Every landfill has conditions that are unique. Terrain and atmospheric conditions play a large role in the impact to uses surrounding a landfill.

This is not theoretical, we know that even with a mile buffer there are notable complaints.

61-4

4.10-17

"Based on the examples it was determined that it is likely that increased development in the vicinity of the landfill will result in an increase in odor complaints which could lead to pressure for the landfill to implement additional odor control measures."

Enclosing compost operations, counter to what was stated, would be sizable and extremely expensive. The resulting of doing this would not insure that all odors from the operation would be contained.

Transporting waste to another facility would be very costly. Finding an alternative isolated, non-controversial, location within the County to process material or green waste would be nearly impossible.

61-5

So called odor neutralizing misters do not eliminate odors, only cover them up. Is a heavy perfume smell of maybe lavender a good alternative. Effectiveness is questionable.

No compensation from the developer or the County has been offered, so any costs related to minimizing the impact of the landfill on nearby properties would have to be absorbed by the ratepayers, which constitutes a large segment of the Placer County population.

Again, it was stated that "Impacts relative to consistency and COMPATIBILITY of proposed land uses with the landfill would be POTENTIALLY SIGNIFICANT.

61-5 cont.

4.10-18
Where have building design, landscaping design, and deed notification proven to truly lessen the complaints related to a landfill, especially odor impacts?

"These measures would not eliminate the source of the odor or any of the factors that contribute to intensification or range of perception of odor depending on circumstances, such as wind, temperature inversions, specific operating methods, and amount/type of waste. Therefore this impact would be SIGNIFICANT AND UNAVOIDABLE.

61-6

4.3-6
Need to specify that the reference to "alternative daily cover" and more particularly "sludge" is sewage waste from the nearby Lincoln Wastewater plant. It is used to help facilitate the breakdown of waste material in the landfill. The sewage waste was noted as a high contributor in the detection of offensive odors coming from the landfill.

I counted eight times were "incompatibility/incompatible/questioning compatibility" were mentioned in relationship to landfill operations and residential development. Seems like a clear signal that this project as currently presented is not wise and would have wide ranging negative implications to the residents of Placer County.

We are trying to force the preverbal square peg into a round whole. This plan needs to accommodate the landfill rather than the landfill accommodating the plan.

I believe the real test of whether this plan is based on reasonable acceptable facts is whether the developer, or those that prepared the report, or any of you in this room would want to live or have any of your family members live in this community? If you are being truly honest, I think the answer would be "no".

61-7

Letter 61	Wayne Nader February 14, 2019

61-1 This comment reproduces, with added capitalization, text from Draft EIR page 4.10-8 that quotes Placer County General Plan Policy 4.G.11. Although this comment is under a header of "technical flaws and deficiencies," the commenter has not provided a comment to explain what he or she feels is a flaw or deficient; therefore, no response can be provided other than that the Draft EIR evaluated impacts associated with incompatibility in Section 4.10, "Land Use."

61-2 Although this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, the summary text for Impact 4.10-2. Although this comment is under a header of "technical flaws and deficiencies," the commenter has not provided a comment to explain what he or she feels is a flaw or deficient; therefore, no response can be provided.

61-3 Although this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, text found on Draft EIR page 4.10-15. Although this comment is under a header of "technical flaws and deficiencies," the commenter has not provided a comment to explain what he or she feels is a flaw or deficient; therefore, no response can be provided.

61-4 Although this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences, text found on Draft EIR page 4.10-16. The commenter's opinion that comparing other landfills to the WRSL is meaningless is noted and will be considered by decision makers. It is true that terrain and atmospheric conditions affect where odor can be detected in relation to its source; however, the comparison to other landfills is not intended to suggest how odors would be perceived at the WRSL. Rather, the Draft EIR uses this comparison to discuss the potential range of outcomes that could occur at WRSL if odor complaints directed at the WRSL result in enforcement actions and/or other odor controls. As stated in the Draft EIR on page 4.10-16,

> Several examples of landfills subject to odor complaints and their outcomes are provided below. Note that these examples are not exhaustive diaries of all odor complaints, legal complaints, settlements, orders, and violations at these facilities, nor are they necessarily reflective of current conditions at each facility or indicative of what is occurring at the WRSL. Rather, these examples are intended to provide a representative sample of some of the results of odor complaints at a range of locations within California.

The County believes that this analysis of outcomes at a variety of facilities across the state is adequate to determine some possible outcomes at the WRSL if enforcement actions and/or other odor controls are implemented at the WRSL.

Regarding the comment's claim that "there are notable complaints" under current conditions, the Draft EIR discusses current odor complaints on pages 4.3-7 through 4.3-11.

61-5 Although parts of this comment are in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, text found on Draft EIR page 4.10-17.

Contrary to the comment's representation, the Draft EIR does not state that enclosing compost operations would be inexpensive or minor. Indeed, the SCS Engineers Report in Appendix J of the Draft EIR notes that enclosure of composting operations is more expensive than windrow or aerated static pile composting operations and that enclosing operations would require substantial modifications. The Draft EIR, contrary to the comment's claim, states on page 4.10-17 that enclosing

compost "could require minor *construction* (e.g., for an enclosure) and would require a change to activities within the WRSL property and likely would not result in substantial additional environmental impacts" (emphasis added). This Draft EIR statement is still correct, because the construction would take place within the existing confines of WRSL parcels and construction would be minor in the context of SAP buildout. See also Master Response 4: Odors for a discussion of revisions to this portion of the Draft EIR.

The commenter's opinion that enclosing composting operations would not ensure that odors would be contained is noted; however, it should also be noted that the Draft EIR does not claim that an enclosure would prevent all odors from the composting operations. Rather, page 4.10-17 of the Draft EIR lists several changes to composting operations, including an enclosure and applying finished compost to active compost, as some methods that could "reduc[e] odor intensity." In addition, making changes to composting operations is just one of "a range of potential odor control measures" discussed in the Draft EIR. See also Master Response 4: Odors for a discussion of revisions to this portion of the Draft EIR.

The Draft EIR on page 4.10-17 lists diversion of waste to another facility as one of "a range of potential odor control measures," but it does not specify that the facility would need to be in the county and it does not discuss the cost of the measure. Nonetheless, the commenter's opinion is noted and included in the record for consideration by decisionmakers. See also Master Response 4: Odors for a discussion of revisions to this portion of the Draft EIR.

The Draft EIR on page 4.10-17 lists odor-neutralizing misters as one of "a range of potential odor control measures." Regarding the comment's statement that the effectiveness of odor neutralizers is questionable, the Draft EIR notes on page 4.10-17 that "[t]he WPMWMA is conducting a pilot study to assess the value of odor neutralizers." The SCS Engineers report in Appendix J of the Draft EIR states that "odor-reducing misters are best applied as a last line of defense against odor impacts because their impact can be unreliable if misapplied. Target use of odor-reducing misters, such as at the MRF, is expected to be more reliably effective." The comment's suggestion of a heavy perfume smell or lavender is noted and will be considered by the decision makers.

61-6 Although a part of this comment is in quotation marks, it does not appear to be a direct quotation from the Draft EIR. The comment appears to restate, with some differences and added capitalization, text found on Draft EIR page 4.10-18.

Landscaping design, such as windbreaks, can reduce odor. Windbreaks can deflect an odor plume upward. Building design can control how odor enters a building by, for example, facing windows in a certain direction compared to wind direction. Deed notification does not reduce odors, but it could help with the sensitivity of the receptor group by allowing potential future residents who may be particularly sensitive to odors to look for housing elsewhere. However, consistent with the conclusion of Impact 4.10-2, even with implementation of these measures, the impact would be significant and unavoidable.

61-7 The comment states that the Draft EIR should reference that "alternative daily cover," or more particularly "sludge," is sewage waste from the nearby wastewater treatment plant and that it is a high contributor in the detection of offensive odors coming from the landfill. Draft EIR Appendix J notes that "[w]astewater sludge from the Roseville wastewater treatment plant (WWTP) is also a significant source of odor." In the recommendations, it is again noted that this sludge results in odors. The study also notes that fines are derived from municipal solid waste and the materials recovery facility, and those are used as alternative daily cover. No revisions have been made to the Draft EIR.

Also, see Master Response 4: Odors. The remainder of this comment expresses an opinion about the merits of the project and does not raise an environmental issue. These comments are noted and will be included in the record for consideration by decision makers.

From: Peggy Peterson <peggyjust@yahoo.com>
Sent: Sunday, January 13, 2019 5:23 PM
To: Shirlee Herrington; ejevaldi@placer.ca.gov; Christopher Schmidt; Crystal Jacobsen; Kally Kedinger-Cecil
Subject: Request for comment deadline extension

Letter 62

Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIRs recently released.

Comments for WHI and II are due by 5:00 pm 1/14. This is a MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totaling roughly 80 homes. CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300." The County has "dumped" 3 DEIRs upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIRs appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs. The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, and as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the date for review should be extended to afford the community its guaranteed right to comment.

62-1

Thank you in advance for your consideration of my request,

Peggy Just Peterson
Granite Bay, CA

Letter 62	Peggy Just Peterson January 13, 2019

62-1 This comment letter is virtually the same as the content of comment letter 32. Therefore, this response simply cross-references to responses to this letter. See responses to comments 32-1 through 32-3.

February 16, 2019

Letter 63

Chair and Members of the
Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator (sherring@placer.ca.gov)

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed Placer County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan (SAP) and the Placer Ranch Specific Plan (PRSP). I am submitting the following comments, questions and concerns that I wish to be included in the public comments and addressed by the County.

4.2.1 ***Conversion of Farmland***
This project would convert many acres of agricultural land to non-agricultural uses. The amount of acreage is of great concern to me for many reasons. The Placer County General Plan and the Placer Legacy Open Space and Agricultural Conservation Program have goals and policies that favor preservation of farm lands and minimize impacts to them. This DEIR seems in direct opposition to those goals and objectives, as this plan would eliminate 6% of the remaining farm land in the County. This is a loss to the county both economically and ecologically, but that isn't addressed in the DEIR. Where is that information? Surely there is a benefit that these lands provide as they are.

Farmland not only provides income and commodities, it helps in many other ways that would lessen the impacts of this project if that land is left in agricultural designation. While agricultural land does not provide the diversity and quality of habitat that designated preserve land does, it does offer needed foraging space for many different birds, including many of the species which are noted in the DEIR as being species of concern. The open land left in this general area supports one of the highest populations of wintering hawks in California. Tricolored Blackbirds use agricultural land and are in the vicinity. Agricultural lands also provide much appreciated visual buffers and relief from the suburban sprawl and bring people a peaceful visual respite. 63-1

This DEIR needs to address the value of all the benefits that these lands offer.

Mitigation measure 4.2-1a, 1b would have land elsewhere purchased to mitigate this loss of farmland. This will still result in the net loss of farmland in the county. How can this be considered a mitigation measure if the end result is loss of farmland, while the County states in the General Plan a goal is to preserve farmland?

4.5 ***Cultural Resources***

4.5-1 In this section it is unclear if the TCR's are any of the previously recorded sites or isolated finds. Since the PRSP area received intensive pedestrian surveys, it seems that these areas would have been surveyed also. What is the correlation of the TCR's and the survey and the previously recorded sites and/or isolates?

4.5-2 The net SAR area needs to have a current archaeological pedestrian survey that will relocate the known and recorded sites. These sites and any other sites discovered must be evaluated for significance.

63-2

4.4-1 ***Biological Resources – Analysis, Impacts and Mitigation***

The whole premise of the mitigation measures relies on the PCCP. The PCCP is not even in existence. Nothing has been approved or put into the county documents for this plan. How can this DEIR even be considered when many mitigation measures throughout the document refer to and depend upon a non-existent program? That being said as my overarching complaint with this DEIR, my specific comments continue.

Removing natural vernal pool habitat is not acceptable. There are special status species of plants and animals associated with the vernal pool habitat and there is no way to compensate for the loss of this unique habitat. Habitat creation is not a substitute for naturally occurring vernal pools. Vernal pools have a long history – thousands to millions of years in the making under unique conditions. That history is in the soils, topography, and genetics of the entire community of adapted species associated with that habitat. Many members of this community, especially the microorganisms involved, are still poorly known and understood. No constructed recreation can have that history. While there may be some success in getting certain parts of the ecological community established in constructed vernal pools, their long-term viability is not assured without the presence of the entire community and the conditions in which it can flourish. The mitigation areas seen from Athens Road where vernal pools have been constructed look nothing like the naturally occurring vernal pool areas. Pools do not naturally occur as regularly exact in size, spacing, or shape as these are. If all or most of the SAP area in the Reserve designation are constructed pools, then we are accepting those poor substitutes as the new reality of vernal pools, and losing the real, irreplaceable thing.

63-3

4.4.1 ***Regulatory Setting***

The vernal pool recovery section mentions the Western Placer County core area. How does that area overlay on the SAP/PRSP area? A map is needed to supply that information. Since the goal of that plan is to retain 85% of remaining vernal pool fairy shrimp habitat in that core area, we need to know where that area is located. Why can this proposed plan be considered if it doesn't comply with the County's plan for vernal pools?

4.4.5-a ***Mitigation for special status animals***

These measures again rely on the PCCP, a plan that does not exist as a County approved plan. There would be a considerable amount of land involved that would result in the loss of substantial habitat for numerous species. Once removed it is a net loss in the county and

the state. Buying mitigation credits does nothing for the net loss of habitat. These species of concern are getting pushed out in every direction. Do not further stress their populations. Do not further interrupt their corridors for movement. 63-3 cont.

4.3.6 *Objectionable Odors*

A look at the odor complaint and notification history map in 4.3-6 shows that the majority of complaints are from residences south of the landfill site and associated with the landfill. This is beyond the one-mile buffer zone currently in effect for residential development. The proposed PRSP seeks to reduce the buffer zone to 2000 feet. This will certainly dramatically increase the number of complaints. How will these complaints be handled? Since it would be a County initiated problem, it seems the County should be responsible.

The Western Placer Waste Management (WPWMA) provides a vital service to much of Placer County and it is the dominant feature of the area. This plan needs to acknowledge that feature and look for compatible development ideas for nearby land that respect the existing buffer zone exclusions for use. Residential development in the PRSP doesn't fit.

The only alternative of those proposed in the DEIR that would be acceptable is Alternative #1. – No project. The list of substantial impacts is too great. This DEIR has two aspects that seem to need addressing before any plan can be proposed for the SAP. First, the plan relies on the Pleasant Grove Retention Basin expansion before this area can be developed. That permission has not been obtained. Second, this plan relies heavily on the PCCP to solve many conservation issues. As stated previously, this plan is not an approved plan – only a concept. There is too much land involved that is subject to a high level of use that is not present there now. This proposed plan is a continuation of the plans of the 1990s that have gotten the surrounding areas into the urban sprawl situation they are in now – with attendant problems of bad traffic, no rapid transit, no natural habitat left, too many single-family homes, etc. What is needed is a clear vision for the future and this DEIR does not do this. 63-4

I do suggest a serious study of the Citizen Initiated Smart Growth Plan by all members of the Planning Commission. It provides a plan that carefully considers what is there now and a smart way to approach development in a much more compatible way with the land.

I do not appreciate or approve of the way this environmental document was produced. How is Placer County both the creator of the DEIR and the reviewer of it?
Why is my tax money being used to create a specific plan document for the developer who will profit greatly by the project?

Sincerely,
Gayle Russell
A Placer County concerned resident of
English Colony Way
Penryn, CA

Letter 63	Gayle Russell February 16, 2019

63-1 The comment expresses concern regarding the project's conversion of Farmland to a nonagricultural use. Loss of Farmland is addressed in the Draft EIR in Section 4.2, "Agricultural Resources," under Impact 4.2-1, conversion of farmland to a nonagricultural use; as described therein, this impact would be significant and unavoidable even after mitigation. Placer County General Plan policies related to agriculture and Placer Legacy Open Space and Agricultural Conservation Program objectives are described on pages 4.2-8 through 4.2-11 of the Draft EIR. Further, the Draft EIR describes that because the project would result in the conversion of almost 6 percent of Placer County's total Farmland, the project would also result in a significant cumulative impact associated with overall Farmland conversion in the region (see pages 4.2-17 and 4.2-18).

See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts, which include specific requirements for public agencies to consider potentially significant adverse environmental effects of projects before taking action on those projects; avoid or mitigate, wherever feasible, the significant adverse environmental effects of projects it approves or implements; and, prepare findings and issue a "statement of overriding considerations" explaining why they believe, based on substantial evidence, those significant effects are acceptable. The County has complied with CEQA requirements by identifying the project's significant and unavoidable impacts in the Draft EIR. As part of the project approval process, the Placer County Planning Commission and Board of Supervisors will review and consider the EIR analysis as well as all comment letters submitted during the Draft EIR public review period and the written responses to those comments before a decision on the project is rendered.

Regarding the comment about economic and ecological loss to the County related to this Farmland conversion, see response to comment 71-21. Also, see Sections 4.4, "Biological Resources," and 4.1, "Aesthetics," of the Draft EIR, which address the habitat and visual benefits provided by the agricultural lands within the project site.

See responses to comments 12-11 and 52-24 regarding the project's Farmland conversion impact and accompanying mitigation measures. As described in the Draft EIR on pages 4.2-14 and 4.2-15,

> Although the conservation easements identified for Mitigation Measures 4.2-1a and 4.2-1b could partially offset the direct conversion of Farmland in the project area, this approach would not create new Farmland to replace Farmland that would be lost, and no additional mitigation is feasible. Therefore, the impact would be **significant and unavoidable.**

Thus, the Draft EIR acknowledges the project's conversion of farmland to be a significant and unavoidable impact, even with mitigation.

63-2 The comment raises questions regarding tribal cultural resources (TCRs). As stated in the Draft EIR (page 4.5-23), although no specific TCRs have been identified through the AB 52 process, United Auburn Indian Community (UAIC) identified two locations in the PRSP area as being sensitive to potential TCRs. After the close of the AB 52 consultation process, the UAIC identified several additional features that they consider to be TCRs. These are identified with an asterisk in Table 4.5-1 of the Draft EIR. Table 4.5-1 also includes a brief description of these features, which answers the commenter's questions.

The comment also raises issues regarding the treatment of known and recorded archaeological sites and the need for pedestrian surveys in the SAP. These are addressed in the Draft EIR, which states (page 4.5-27) that SAP Policies CR-1.1, 1.5, 1.6, and 1.7 require the survey of areas with a moderate to high degree of sensitivity for cultural resources, the evaluation of archaeological resources for inclusion in the National Register of Historic Places and California Register of Historical Resources,

that discretionary development projects are designed to avoid potential impacts to significant cultural resources whenever possible, and requires the suspension of construction activities if and when cultural resources are discovered and the retention of qualified cultural resources specialist to assess the finds and develop measures for the protection, recordation, or removal of the cultural resources.

63-3 The comment states that the mitigation measures rely on the PCCP, which does not yet exist (is not yet approved or adopted) and that created vernal pools cannot substitute for naturally occurring vernal pools and their long-term viability is not assured.

The Draft EIR provides participation in the PCCP as an option for mitigating project impacts on biological resources covered under the PCCP should it be adopted and available by the time future projects are implemented. The Draft EIR does not rely solely on the PCCP for impact mitigation; there are optional mitigation measures and front-loaded policies and programs, presented under the heading "Proposed Sunset Area Plan Goals and Policies" beginning on page 4.4-31 of the Draft EIR, that mitigate the project's potential impacts on biological resources in the event the PCCP, including the Western Placer CARP and associated USACE programmatic permits, are not adopted or are not available as a permitting and mitigation strategy for future projects. See also Master Response 3: Placer County Conservation Program and Mitigation.

The project does not propose creating vernal pools within the on-site Preserve/Mitigation Reserve or Open Space Preserves land use designations. As described under Mitigation Measure 4.4-1a, project proponents would be required to replace or restore on a "no-net-loss" basis the function of all wetlands and other waters that would be removed, lost, and/or substantially degraded as a result of implementing the respective project. Mitigation methods may consist of establishment of aquatic resources in upland habitats where they did not exist previously, reestablishment (restoration) of natural historic functions to a former aquatic resource, enhancement of an existing aquatic resource to heighten, intensify, or improve aquatic resource functions, or a combination thereof. The compensatory mitigation may be accomplished through purchase of credits from a USACE-approved mitigation bank, payment into a USACE-approved in-lieu fee fund, or through permittee-responsible on-site or off-site establishment, reestablishment, or enhancement, depending on availability of mitigation credits. Created or restored vernal pool habitats would be required to meet annual performance standards and final success criteria to demonstrate no net loss of function or corrective measures would be required.

The comment also asks how the Western Placer County core area overlays on the SAP area and requests a map providing that information. The comment also asks how the proposed plan can be considered if it does not comply with the County's plan for vernal pools. The Western Placer County vernal pool recovery plan core area is shown with the SAP area overlay in Exhibit 4.4-4 of the Draft EIR. It is unclear to what the comment is referring as the "County's plan for vernal pools." The vernal pool recovery plan discussed in the comment is a USFWS plan for recovering federally listed vernal pool species; it is not the County's plan. The vernal pool recovery plan is not regulatory in nature; however, it may be taken into consideration when analyzing potential impacts on vernal pools and associated biota. Consistency with the vernal pool recovery plan is not required by law.

63-4 The comment expresses concern about objectionable odors and the possibility of the project resulting in an increased number of odor complaints. See Draft EIR Impact 4.10-2 and Master Response 4: Odors for a discussion of the potential for the project to result in more odor complaints and what the potential effect of those odor complaints may be. Refer to them also for a discussion of responsibility for implementing odor control measures at the WRSL.

The commenter's opinion that the No-Project Alternative is the only acceptable alternative is noted and will be included in the project record for consideration by decision makers. Because this comment speaks to the merit of the project and does not raise a significant environmental issue, no additional response is necessary.

Regarding the comment that the County should study the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan for a discussion of the CISGP.

The SAP is an area plan that provides the policy framework and zoning for the community. The County regularly updates and funds plan updates through the County's general fund. The Draft EIR explains the purpose of the SAP on page 1-1:

> To renew and re-energize the vision for the Sunset Area, the County is proposing an update to the existing SIA Plan. The proposed updated plan, the Sunset Area Plan (SAP), is the policy document which, together with proposed development standards and design guidelines, will guide growth in the SAP boundaries for the 20-year planning horizon.

Preparation of the EIR is required under CEQA:

> The County is the lead agency for consideration of this EIR and proposed project approval. CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, the significant adverse environmental effects of projects it approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency decision makers, in this case the Placer County Board of Supervisors, must articulate and adopt findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that they believe, based on substantial evidence, make those significant effects acceptable (PRC Section 21002; State CEQA Guidelines Section 15093).

It should also be noted that the funding for the SAP/PRSP is split between the County (for the SAP) and the applicant for the PRSP (a private development project).

Ms. Shirlee Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

Email: sherring@placer.ca.gov

Letter 64

Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

In reviewing the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas, I have a number of concerns. Re-view is in accordance with the California Environmental Quality Act ("CEQA") and Public Re-sources Code, Section 21000, et.seq. CEQA requires the County address and fully mitigate the effects of the plan upon public health and natural resources, etc. Placer County used Ascent Environmental company to gather data and methodology used in your Tables. However, upon review, the DEIR reveals over 60 significant and unavoidable impacts in almost every category. Negative impacts will impose serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. (See Exhibit 1-2 Proposed PRSP Land Use Plan)

In addition, implementation of the project would require conversion/loss of Farmland (Prime, Farmland, Farmland of Statewide or Local Importance or Unique Farmland) to nonagricultural use. This project could result in the total conversion of over 7,295 acres, which would be a signif-icant loss. Mitigation has been identified that requires an option for preservation of Farmland at a 1:1 ratio, or to mitigate in accordance with the PCCP at such time it is adopted, the mitigation would only partially offset the direct conversion of Farmland in the project area. This approach would not create new Farmland to replace Farmland that is lost , AND no additional mitigation is possible.

64-1

Population/Employment/Residential Impacts in Specific Plan Areas:

The DEIR, is a large draft document that will serve as a guide to growth of over 8,047 acres of land located in the western portions south Placer County. A specific plan, the Sunset Area (SA) Plan located within the City of Roseville and surrounding many existing neighborhoods where a future buildout of (yet undetermined) Sacramento State college campus is expected. The college campus combined with surrounding land uses projects an increase in student population of up to 30,000 students at buildout. A regional retail district is included in SA which is twice the size of the Galleria, Fountains, and adjacent box stores combined; and will compete with existing retail in Lincoln, Rocklin and Roseville. The inclusion of more retail will result in low paying wage jobs that will not support the costs of housing and accompanied lack of transit alternatives in this pro-ject will cause unwarranted vehicular congestion and negative impacts upon air quality. The DEIR offers no alternative transit opportunities for students and residents to ameliorate the nega-tive and significant impacts of this project upon public health.

64-2

Housing alternatives are not fully mitigated in the DEIR. The location of SA area plan in Lin-coln/Rocklin includes the addition of 5,636 low density housing units to be built within 1000 feet of Western Regional sanitation plant/Landfill facility with no adequate buffer from odor, nor miti-gation to better the expected negative health consequences upon public. Landfill and Buffers: (See Land use 4.10.1) which allows residential development as close as 1000 feet and suspect-ed odors will affect public health. According to the DEIR (Section 4.3-5), the Western Placer Waste Management Authority is actively engaged in yet incomplete studies concerning odors and mitigation of such the nature, and effectiveness of studies or strategies are as yet unknown, no quantifiable thresholds of significance for odor impacts is offered in the DEIR, and no existing fee program or other mechanisms is contemplated in order to fund the costs of odor mitigation in the DEIR. This impact would be significant upon the public health if not fully mitigated in the DEIR.

Transportation and Traffic and Air Quality

Placer Parkway (PP): A Multi-land expressway included in the plan offers no other transit alter-native that reduces expected increase in CO2 emissions from increased vehicular traffic upon local project roadways. Such an increase in traffic will negatively affect air quality standards im-posed by the California Air Resources Board (ARB) with no alternative transit mentioned in the DEIR. PP creates significant roadway construction and right of ways in the planning areas; noise, air quality are considered unavoidable and significant. Long-term emissions exceed max-imum allowed under the ARB guidelines with no off-site mitigation plan and significant/unavoidable effects upon public health. Toxic air contaminants will exist within 500 feet of Hwy 65 which currently experiences up to 100,000 vehicle trips per day. Hwy 65 will be con-gested with at least 895,317 new daily vehicle trips per day (this does not include surrounding freeways I-80 and I-50 which will connect to the proposed Placer Parkway). Significant negative impacts need to be fully mitigated to avoid serious impacts of bad air quality upon Placer resi-dents. 64-3

Environment/Land

The DEIR does not complete studies of the cumulative and undesirable impacts upon local spe-cies (reptiles, birds, migration, habitat, swainson hawk, etc.) no existing alternative no mitigation study fully addresses the effects upon the loss of 7,297 acres of farmland, species, fauna/flora, and vernal pools as per CEQA Guidelines section 15082(a) (1) will require specific mitigation studies not mentioned in the DEIR. The most significant effects are shown in Table 4.2-1 DEIR as farmland is proposed to be converted to non-ag use, a significant impact upon farmland pro-duction for the Placer/SACOG region. 64-4

Water Quality:

In the DEIR, under the SAP and the PRSP Plan, storm water runoff from Auburn Ravine and Pleasant Grove Creek, all nearby watersheds lack a strong CEQA analysis on the impacts of wa-ter runoff downstream, including viable mitigation and unavoidable significant impacts of adja-cent areas (unincorporated) outside of the county boundaries. Therefore, the DEIR is not taking into consideration the effects of the combined watersheds which may have a significant negative impacts upon water runoff in our Placer communities upon full buildout of the project plan areas. 64-5

I ask that DEIR be revised to include alternative plans to mitigate significant and unavoidable im-pacts upon public health and the loss of over 7,297 acres of Farmland. I also request the Coun-ty consider alternative plans for this project that induces quality land use, transit and smart growth for the project and surrounding areas should it go forward. Please consider the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership. Please revise the DEIR and recirculate to the public for further review and consideration.

Please provide your written response to the address stated below.

Respectfully submitted,

Sincerely,

Delana Ruud
10800 Cramer Rd.
Auburn, CA
February 22, 2019

Letter 64	Delana Ruud February 22, 2019

This comment letter is virtually the same as the content of comment letter 54. Therefore, the responses primarily cross-reference responses to this letter.

64-1 See response to comment 54-1. Also, the comment states that the project's conversion of farmland to a nonagricultural use would be significant, and further states that mitigation would only partially offset the impact because no new farmland would be created. See responses to comments 12-11 and 52-24 regarding the project's farmland conversion impact and accompanying mitigation measures.

64-2 See response to comment 54-2.

64-3 See response to comment 54-3.

64-4 See response to comment 54-4.

64-5 See response to comment 54-5.

Letter 65

Sunset Specific Plan EIR Comments

My wife and I both commented at the February 14, 2019 Planning Commission meeting regarding this project. I have also included the comments I made during the NOP comment period, in an attachment, at the bottom of this email. As I stated at the public hearing on the 14th, we were disappointed to find out you were not going to answer all of the questions and comments received during the NOP comment period, but instead they would be "considered during analysis of potential impacts". We feel all comments received about this project should be answered and or responded to by the county. Not just our comments, but ALL comments. The impression we are getting is that comments are just part of the "process" that you are going through, i.e. scoping meetings, comment periods, Planning Commission Meetings where the county staff does a 1-2 hour song and dance about how great the project is-but the audience only gets three minutes to talk-with no response to those questions or comments, etc etc. The appearance is your staff is "checking the boxes", but doesn't really care what the people/groups have to say. The following are questions and comments we would like answered/addressed: 65-1

First, we would like our questions answered and our comments addressed from the NOP comment period. Our other questions and comments follow.

Section 4.2-4: Cumulative conversion of Farmland to nonagricultural use:

-It states that "The project would result in the conversion of almost 6 percent of Placer County's total farmland." In the Lincoln News Messenger dated Thursday February 21, 2019 it states that Placer County just bought 300 acres on the western edge of the county to convert what was once irrigated pasture back into wetland and species habitat. That is another 300 acres out of agriculture production. It seems as if the "right to farm county" is singlehandedly removing farmland from within its boundaries. We are all for conservation, but conserving land for wetlands and species habitat, is not the same as protecting farming and farmland. You should be *protecting farmland*, which in turn would provide wetlands and species habitat.

Several different chapters:

-Your EIR/project is based on a number of items/programs that are not currently in effect. 65-2
--Chap. 4.9 references the Placer County Conservation Plan ("PCCP"). The PCCP however is not adopted nor has it been circulated for public review and comment. How can the public and the decision makers consider the PCCP in the context of the EIR if it has not been publicly disclosed? If not adopted, how can the Sunset Plan

and EIR adopt goals based on the PCCP (e.g. protecting stream channels as defined in the PCCP (see Policy PFS-5.3 for example).
-In one section of the EIR it states that the Ophir Water Treatment Plant will break ground in 2018. Not only did that NOT happen, according to PCWA, it could be 2029 before they break ground
- The Pleasant Grove Retention Facility is out of your control totally, but yet it is discussed at length at how you have no project without it, is that the best you could come up with?
-The Groundwater Sustainability Plan is not and will not be finished for years
-Your project/EIR counts on recycled water quite heavily, but that is currently not and will not be available for quite some time

How many private projects for private developers has Placer County approved when it was based on things that don't currently exist? Are you setting a precedence that says to future development projects-as long as it might exist sometime in the future you can move forward with your project?

65-2 cont.

Chap. 4.9 - Hydrology and Water Quality:

-The EIR indicates there are presently two existing PCWA Wells at 1000 acre feet per year. And it also appears to indicate that two new wells would be drilled also at a capacity of 1000 acre feet per year. Is this accurate? How many wells are anticipated to be part of the project - 4 wells altogether for dry year water production? Or are there only two wells (e.g. the present PCWA wells)? It is difficult to tell from Chap. 4.9 of the EIR.

--The EIR does not appear to consider the 6 new wells proposed by the City of Lincoln for Village 5 when analyzing **cumulative impacts** - why not?

--What is the condition or mitigation measure that is enforceable that will limit the wells to single-dry year pumping only?

65-3

--The EIR discusses the monitoring of adjacent wells during the use of the Sunset Area Plan wells to determine potential adverse uses as mitigation. What does the Plan consider to be an adjacent well? For example, would existing agricultural wells north of the Plan area be included in the monitoring program?

--What conditions or enforceable mitigation plan is there under this plan that would compel and enforce such well monitoring?

--There does not appear to be any analysis regarding the impacts of dry-year pumping on flows in Auburn Ravine – correct from the wells? Wouldn't dry year pumping of

over 2000 to 4000 acre feet per year of groundwater potentially impact flows in Auburn Ravine?

--While we do recognize that there are many sources of water being discharged into Auburn Ravine, the inference in the EIR that little to no flows existed in Auburn Ravine during the Fall is incorrect. The Scheiber family has diverted water from the Ravine for 100 years and before delivery from PCWA, there was adequate fall flows to accommodate water diversions from the Ravine for use on our property.

- - If at some point in the future, the wells are to be used more often than set forth in the EIR, will there be a requirement for additional environmental review prior to allowing any additional pumping? Will that be a condition of approval of the Plan?

--Placer County and PCWA agree. do they not, that the wells for this project would not have priority over landowners with existing overlying groundwater rights - correct? If they do not agree, then why not? Why would a municipal well have priority over an overlying groundwater right - or have equal priority? Has the County done any analysis of impacts of pumping proposed for the project on existing overlying wells for agricultural uses?

65-3 cont.

--There appears to be no plan, mitigation measure or contingency – or study – relating to the potential for contamination of groundwater from the Landfill. Why was this information omitted from the EIR? While the EIR references the landfill and its regulation by the RWQCB – there is no contingency or evaluation of potential contamination to groundwater resources. In section 4.9.2, page 4.9.6, under Groundwater Quality; it says "Contamination of groundwater with VOC's was first identified at this site in 1995" (landfill). If there are a total of four wells that all get turned on in times of drought, as well as all of Lincoln's wells, what will the cumulative effect be on spreading the contamination throughout the "regional cone of depression" that is discussed on page 4.9.6 under Groundwater Hydrology?

65-4

-Flooding seems to be an issue that is completely solved by the Pleasant grove Retention Facility and the City of Lincoln's Lakeview Farms. But, as noted on page 4.9.30, four paragraphs up from the bottom, the County does not control either one of those sites AND neither one, as mentioned earlier, is complete. So is the flooding problem really solved?

65-5

Thank you,

Albert Scheiber, Scheiber Ranch

12/15/16

Notice of Preparation for Sunset Area Plan / Placer Ranch Specific Plan

To whom it may concern or cares;

I attended the 6:00-8:00 p.m. NOP Scoping Meeting on November 29, 2016. I've been to a lot of meetings but apparently never a scoping meeting. I did not realize there would be no answers given, only questions taken. I did not want to waste everyone's time with my concerns so at the conclusion of the meeting I was looking for a copy of the paperwork the eight or so attendees picked up on their way in. There were none left. I guess the eight or so attendees at the earlier meeting grabbed up all the extra copies. I ended up with about 7 or so of the staff around me wondering what my concerns were and willing to answer my questions because of the extra time they had available. I appreciated that, so I proceeded to ask my questions. It didn't take long before there was only one staff member left and the others had slowly drifted away. Guess they didn't want to answer my questions after all. So here are some of my questions/concerns:

1. How do I get the same benefit of the County fronting all the money, staff and time it takes to take a piece of property through the development process? In other words, if our property ever develops, how do I get that benefit paid for by the people of Placer County with no money out of my pocket?

2. If in the past two other private developers lined up to take on this project, then decided for whatever reason it would not work for them, doesn't this raise a red flag that the project is not a good project? I.e. Too much up front money to complete, no guarantees of potable water, too many environmental issues to mitigate, too much of the project would need to be dedicated (given away)making it unprofitable, etc etc.

3. How long will it be before you close the dump? In my opinion, by moving forward with this project the days are numbered for the dump, especially with the college dorms directly across the road from it. I live several miles away and in the summer it is not uncommon to smell it. The cupcakes living across the street from it will need a hepa filter in their safe room.

4. When did Placer County get into the "for profit" business? I asked why the County was running this project; the response was that the County felt the college was going to be a big money maker and economic draw.

5. How is a private developer supposed to compete with the County? PCWA is already installing potable water lines to supply the project, the PCCP is going to gain a large amount of land set aside for them, the Placer Parkway is on the wish list for a number of agencies, the dump is somewhat under County control, the private property owners are getting the benefit of the project at no cost to them, if a private developer fights against this project with any of these agencies or the county itself they will be on a short list, sounds to me like all the main wheels have been greased to avoid any major opposition. How is a private developer supposed to compete with the County?

6. Why is there no shortage of water for your project, but there is for others? I am in Zone 5 of the PCWA. Every year there is some kind of drama for us to get our raw water for the summer, but as stated above, PCWA is installing potable water lines to service your project before it's off the ground.

7. How can you move forward with a project with important items not in service? The potable water is to come from a plant that has not broken ground for construction yet. The PCCP is not approved. We don't have a regular shuttle to Mars.

8. How does this project or any development help agriculture? Seems like a lot of agriculture land will be lost with this project. Preserving some land with PCCP does not make up for the land lost for agriculture forever. I have the utmost respect for the Placer County Agriculture Department, but they are constantly losing productive land to development.

9. How is PCWA drilling wells for this project going to help sustain the ground water table? I was told at the scoping meeting PCWA will drill 2 wells just for this project, but only for emergency purposes, drought etc. I don't think that will help my wells in a drought.

I misplaced the business card from the lady at the Scoping Meeting that was the only one that stayed around to answer my questions. She was the one greeting all 8 of us (+or-) that attended the meeting. I would like to thank her for her time.

Sincerely,

Albert Scheiber

P.O Box 250

Lincoln. CA 95648

Letter 65 Albert Scheiber
No date

65-1 The comment references scoping comments previously submitted to the County during the NOP public comment period (December 2016). These comments have been addressed or otherwise considered by the County during preparation of the Draft EIR.

The purpose of an NOP is to provide sufficient information about a proposed project and its potential environmental impacts to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (State CEQA Guidelines Section 15082[b]). CEQA does not require lead agencies to prepare written responses to comments received on an NOP; however, lead agencies must consider all information and comments received. The information or comments may be included in the EIR in whole or in part (State CEQA Guidelines Section 15084[c]). The County reviewed and considered all comments received on the NOP, in accordance with CEQA. Appendix A of the Draft EIR contains the NOP and copies of scoping comments received during the scoping period. Some scoping comments presented "significant environmental issues," which were addressed in the Draft EIR (e.g., noise, air quality); others did not, and these were not addressed in the Draft EIR (e.g., opinions about the project, concerns about economic feasibility, etc.). The comments informed the scope and content of the EIR.

Regarding comments on a Draft EIR, CEQA requires lead agencies to evaluate comments on environmental issues received from persons who reviewed the Draft EIR and to prepare written responses (State CEQA Guidelines Section 15088[a]). The written response shall describe the disposition of significant environmental issues raised; there must be a good faith, reasoned analysis in response (State CEQA Guidelines Section 15088[c]). This Final EIR contains written responses to significant environmental issues raised in comments on the Draft EIR (both those provided in writing and those provided at the February 14, 2019 public hearing).

The remainder of the comment is focused on farmland conversion. First, the comment reiterates the Draft EIR conclusion on page 4.2-18 that the project would make a considerable contribution to the significant cumulative impact associated with overall farmland conversion in the region. This cumulative impact is determined to be significant and unavoidable in the Draft EIR. Further, the comment states that Placer County is a Right-to-Farm county that is supposed to be protecting farmland rather than removing it from production. The County's Right-to-Farm Ordinance is described on pages 4.2-11 and 4.2-12 of the Draft EIR. The project's potential to indirectly convert Farmland and/or conflict with land use buffers for agricultural operation is discussed under Impact 4.2-3 on pages 4.2-15 through 4.2-17 of the Draft EIR, wherein the impact is determined to be less than significant because it would be subject to land use buffers between agricultural and nonagricultural uses, and because some agricultural areas adjacent to the PRSP area are planned to be developed as nonagricultural uses. Also, see responses to comments 12-11 and 52-24 regarding the project's farmland conversion impact and accompanying mitigation measures.

65-2 The commenter asks whether it is acceptable for the SAP and PRSP to rely on plans that have not yet been published or facilities that have not yet been constructed. As long-term planning documents it would be inappropriate for the SAP and PRSP to ignore in-process plans being prepared concurrently, especially when substantial information is available related to those plans and when it is reasonably foreseeable that those plans would eventually be adopted. However, the commenter is not correct to suggest that the SAP and PRSP *rely* on those plans. For example, the Draft EIR is clear that although it includes the Pleasant Grove Retention Facility as part of the project and as a primary option for stormwater retention for most of the PRSP area, there are alternate options identified, including on-site retention options, in case the Pleasant Grove Retention Facility is ultimately not selected as the provider of stormwater retention capacity. See response to comment 52-14 and Master Response 6: Drainage and Flooding for more information. Similarly, although the Draft EIR identifies the PCCP as a mitigation option for biological resources, it also provides contingency measures in case the PCCP is not adopted. As a result, changes to these facilities or planning documents would not alter the findings of the Draft EIR.

65-3 The comment asks several questions related to groundwater wells and existing water rights. As discussed in Impact 4.9-2, water services in the SAP would be provided by the PCWA. Apart from dry years, PCWA provides water services based entirely on surface water supplies. PCWA owns two ground water wells that are reserved for emergency and backup use during a single dry year. In multiple dry year scenarios, PCWA would modify surface water agreements to avoid use of the groundwater wells. These wells are located within the SAP but would not be used directly by project and no new wells would be constructed to support the project. PCWA's limited use of groundwater would occur in accordance with the 2007 Western Placer County Groundwater Management Plan (GMP) which includes regular groundwater monitoring in accordance with California Water Code Section 10750. As part of this program, over 32 groundwater wells are monitored throughout Placer County with plan to extend the monitoring network to include at least one monitoring well within each unit of a 5-square-mile grid. Additionally, participants in the GMP are working with the Department of Water Resources to correlate groundwater level data with river state data and to understand groundwater interactions with local steams such as Auburn Ravine and Coon Creek. PCWA would continue to comply with existing water rights and state water management regulations. No aspect of the proposed project would modify the structure or precedence of existing water rights. Additional information can be found in the GMP. Because PCWA is a public agency it is required to comply with

CEQA when it undertakes a project, defined as an activity that may cause direct or indirect change in the environment. A decision by PCWA to increase reliance on groundwater sources could be defined as a "project" under CEQA and would likely require environmental review. The potential for cumulative impacts to groundwater was analyzed in Impact 4.9-7 and considered the cumulative projects listed in Table 4.0-2. This list includes the City of Lincoln Village 5 project.

65-4 The comment asks why the Draft EIR did not consider the potential for the WRSL to contaminate groundwater. The WRSL is an existing and active landfill. Operations and the WRSL would continue similar to existing conditions with the implementation of the SAP. Independent of the SAP and PRSP, the WRSL is proposing an expansion of landfill operations. As discussed in Section 4.9.2, the landfill operates under waste discharge requirements established by the Central Valley Regional Water Quality Control Board in Order No. R5-2007-0047. Contamination of groundwater with volatile organic compounds (VOCs) was first identified at this site in 1995, and a corrective action plan was approved by CVRWQCB in 1997. The source of the VOCs appears to be landfill gas, a product of the action of microorganisms within a landfill (Placer County 2015). The corrective action plan requires the installation of a final cover and a landfill gas extraction system on closed areas of the site. To monitor the effectiveness of the plan, specific corrective action wells are sampled quarterly and evaluated for inorganic and organic constituents (Placer County 2015). This existing source of groundwater contamination is discussed further in Draft EIR Section 4.8, "Hazards and Hazardous Materials."

65-5 The comment questions the proposed use of stormwater retention facilities that are not owned by the County. See response to comment 52-14 and Master Response 6: Drainage and Flooding.

From: barbara smith <smithbarbv@gmail.com>
Sent: Friday, February 22, 2019 10:17 AM
To: Placer County Environmental Coordination Services
Subject: Sunset Area Plan/Placer Ranch Specific Plan

Letter 66

Ms. Shirley Herrington
Placer County Community Development Resource Agency
Environmental Coordination Services

Dear Ms. Herrington:
I'm writing today in response to the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. I am concerned that the numerous and consequential negative impacts outlined by the report will be overlooked and that further review won't occur.

The DEIR documents serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. There are enough concerns in each of these areas that accepting the report as it stands would be inappropriate.

I respectfully request the DEIR be revised to include significant studies on the impacts of this project on surrounding areas, and the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed and considered as a viable project alternative.

66-1

Thank you for your time and consideration. I look forward to receiving your written response via this email.

Barbara V. Smith
February 22, 2019
915 Fawn Creek Trail
Auburn, Ca 95603

Bad officials are the ones elected by good citizens who do not vote.
George Jean Nathan

Letter 66	Barbara V. Smith February 22, 2019

66-1 The comment expresses concern that the impacts identified in the Draft EIR will be overlooked and that further review will not occur. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts, which include specific requirements for public agencies to consider potentially significant adverse environmental effects of projects before taking action on those projects; avoid or mitigate, wherever feasible, the significant adverse environmental effects of projects it approves or implements; and prepare findings and issue a "statement of overriding considerations" explaining why they believe, based on substantial evidence, those significant effects are acceptable. The County has complied with CEQA requirements by identifying the project's significant and unavoidable impacts in the Draft EIR. As part of the project approval process, the Placer County Planning Commission and Board of Supervisors will review and consider the EIR analysis as well as all comment letters submitted during the Draft EIR public review period and the written responses to those comments before a decision on the project is rendered.

The comment also expresses concern about the project's effects on public health, air quality, housing, wildlife, and the transportation system. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the adequacy of the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative. Also see Master Response 8: Recirculation.

From: Roger Smith <rdsmith2009@gmail.com>
Sent: Thursday, February 21, 2019 7:01 PM
To: Shirlee Herrington
Subject: Comments on DEIR

Letter 67

TO: Placer County Planning

The Draft EIR for the **Sunset Industrial Area Project and the Placer Ranch Specific Plan** revealed 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts to the public, create a jobs housing imbalance that will exacerbate the existing available housing crisis, put resident and migratory animal species at risk of extinction and jeopardize the planet with GHG. The DEIR is incomplete and inadequate because it fails to suggest, or properly analyze, an 'Alternative Project' that that lessens adverse and unavoidable impacts to a less than significant level. The absence of such an Alternative does not allow the County to make an informed decision about the Project.
I respectfully request that you recirculate the DEIR and that the Citizen Initiated Smart Growth Plan, created by the **Alliance for Environmental Leadership**, be analyzed as a project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed project and meets County objectives, as set forth in the DEIR. 67-1

Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Roger Smith
Newcastle, CA
(916)652-5685
(916)300-6310 cell

Letter 67	Roger Smith February 21, 2019

67-1 This comment letter is virtually the same as the content of comment letter 55. Therefore, this response simply cross-references to responses to this letter. See response to comment 55-1.

From: LYNNE SNYDER <snyderlaw2@gmail.com>
Sent: Friday, February 22, 2019 9:24 AM
To: Shirlee Herrington
Subject: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report

Letter 68

Ms. Shirlee Herrington
Environmental Coordinator

Dear Ms. Herrington,
We are addressing our concerns to you on this proposed development which will have destructive impact on our immediate community in Lincoln.
The Draft EIR for this plan reveals significant impacts to the environment that cannot be mitigated. Because of the destructive environmental impacts for our community, the Board of Supervisors should terminate the proposal by approving the "No Project" alternative.
If the Board determines to pursue the project, the Draft EIR must be recirculated because it fails to adequately analyze environmental impacts and is incomplete.
We appreciate this opportunity to provide comments on the DEIR. We look forward to a spirited discussion and careful reconsideration of the impacts on this precious parcel representative of Placer County.
Respectfully,
Lynne Snyder
Mark Snyder
2676 Black Hawk Lane
Lincoln, Ca. 95648

68-1

Letter 68	Lynne and Mark Snyder February 22, 2019

68-1 The comment is directed toward the project approval process and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.

The comment requests that the Draft EIR be recirculated but does not provide specific reasons why the Draft EIR impact analysis is inadequate or incomplete. Therefore, a response is not warranted.

From: angela4rocklin@yahoo.com
Sent: Friday, February 22, 2019 4:38 PM
To: Shirlee Herrington
Subject: Placer Sunset Area Plan DEIR

Letter 69

- Dear Ms. Herrington:

This week I had the opportunity to review the Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan. The Draft reveals up to 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts on the public, and further create a jobs housing imbalance that will exacerbate the existing available housing crisis. The DEIR also puts Placer residents at odds with promising environmental degradation, loss of rare habitat, a project that will significantly affect local migratory environment of rare birds and animal species, vernal pools, migratory birds that rely significantly on food, migratory breeding grounds where vernal pools now exist, reptiles, fauna and flora stand to be annihilated should this project go forward without significant mitigation. The Draft EIR for the Sunset Industrial Area Project and the Placer Ranch Specific Plan revealed 60 significant and unavoidable impacts to the environment that will cause health, safety and quality of life impacts to the public, create a jobs housing imbalance that will exacerbate the existing available housing crisis, put resident and migratory animal species at risk of extinction and jeopardize the planet with GHG. The DEIR is incomplete and inadequate because it fails to suggest, or properly analyze, an Alternative Project that that lessens adverse and unavoidable impacts to a less than significant level. The absence of such an Alternative does not allow the County to make an informed decision about the Project. I respectfully request that you recirculate the DEIR and that the Citizen Initiated Smart Growth Plan, created by the Alliance for Environmental Leadership, be analyzed as a Project alternative because the Citizen Initiated Smart Growth Plan is environmentally superior to the proposed Project and meets County objectives, as set forth in the DEIR. Please accept my written response to the SA/PRSP DEIR. I look forward to your written reply.

69-1

- ***Sincerely, Angela Torrens residing at: 5313 Swindon Road, Rocklin, CA 95765***
-
-
-
-

Sent from Yahoo Mail on Android

Letter 69	Angela Torrens February 22, 2019

69-1 The comment expresses concern about the project's effects on public health and safety, quality of life, jobs/housing balance, and biological resources. These issues are addressed in their respective sections of the Draft EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted.

The remainder of the comment letter is virtually the same as the content of comment letter 55. Therefore, this response simply cross-references to responses to this letter. See response to comment 55-1.

	Emily Anne Ward <emilyanneadem6@gmail.com>
Sent:	Wednesday, February 20, 2019 9:20 PM
To:	Placer County Environmental Coordination Services
Subject:	Sunset Area Plan/Placer Ranch Specific Plan DEIR Report - State Clearinghouse No. 2016112012, Vol. 1&2

Letter 70

Dear Ms. Herrington:

Thank you for the opportunity to review the December 2018 Draft Environmental Impact Report (DEIR) for the Sunset Area (SA) Plan and the Placer Ranch Specific Plan (PRSP) areas. The review is in accordance with the California Environmental Quality Act ("CEQA") and Public Resources Code, Section 21000, et.seq. CEQA requires the County address and fully mitigate the effects of the plan upon public health and natural resources, etc. It is noted the County used Ascent Environmental company to gather some data and methodology used in your Tables. However, upon further review, we find the DEIR reveals significant and unavoidable impacts in almost every category. Negative impacts will impose serious consequences upon public health, air quality, housing, wildlife, and mobility in the proposed Placer Parkway transportation systems if this plan were to go forward as presented in the DEIR. (See Exhibit 1-2 Proposed PRSP Land Use Plan) Population/Employment/Residential Impacts in Specific Plan Areas:

The DEIR, a voluminous environmental draft document covers a dynamic area and will serve as a guide to the growth of over 8,047 acres of land located in the western portions south Placer County. A specific plan, the Sunset Area (SA) Plan located within the City of Roseville and surrounding many existing neighborhoods where a future buildout of (yet undetermined) a college campus is expected. The college campus combined with surrounding land uses projects an increase in student population of up to 30,000 students at buildout. A regional retail district is included in SA; twice the size of the Galleria, Fountains, and adjacent box stores combined; and will compete with existing retail in Lincoln, Rocklin, and Roseville. The inclusion of more retail will result in low paying wage jobs that will not support the costs of housing or travel in these plan areas.

In addition, the location of SA area plan in Lincoln/Rocklin includes the addition of 5,636 low-density housing units to be built within 1000 feet of Western Regional sanitation plant/Landfill facility with no adequate buffer. Landfill and Buffers: (See Land use 4.10.1) which allows residential development as close as 1000 feet and suspected odors that will affect public health.

The whole project area projects up to 13,219 new residents living in the entire SA and PRSP project area and the lack of studies upon the air quality with close proximity to a landfill or the buildout of Placer Parkway is not fully litigated in the DEIR. According to the DEIR (Section 4.3-5) the Western Placer Waste Management Authority is actively engaged in a planning process …odor abatement strategies, the nature, and effectiveness of those strategies are as yet unknown, no quantifiable thresholds of significance for odor impacts is offered, and no existing fee program or other mechanisms used to fund the costs of odor mitigation is absent in the DEIR. This impact would be significant upon public health is not fully mitigated.

70-1

Transportation and Traffic and Air Quality Placer Parkway (PP): A Multi-land expressway included in the plan offers no other transit alternatives that reduce carbon monoxide (CO_2 emission from vehicles) negatively affecting air quality standards as imposed by the California Air Resources Board (ARB). PP creates significant roadway construction and right of ways in the SIA and PRSP areas; noise, air quality is considered unavoidable and significant. Long-term emissions exceed the maximum allowed under the ARB guidelines with no off-site mitigation plan and significant/unavoidable effects upon public health. Toxic air contaminants will exist within 500 feet of Hwy 65 which currently experiences up to 100,000 vehicle trips per day. Hwy 65 will be congested with at least 895,317 new daily vehicle trips per day (this does not include surrounding freeways I-80 and I-50 which will connect to the proposed Placer Parkway). Significant negative impacts need to be fully mitigated to avoid serious impacts of bad air quality upon Placer residents.

70-2

The DEIR does not study the cumulative effects upon the species existing in the plan area, the effects upon the loss of 7,297 acres of farmland, species, fauna/flora, and vernal pools as per CEQA Guidelines section 15082(a) (1) will require specific mitigation studies not mentioned in the DEIR. The most significant effects are shown in Table 4.2-1 DEIR as farmland is proposed to be converted to non-ag use, a significant impact upon farmland production for the Placer/SACOG region. 70-2 cont.

Water Quality:
Under the SAP and the PRSP Plan, stormwater runoff from Auburn Ravine and Pleas-ant Grove Creek, nearby watersheds has no CEQA analysis done on the impacts of water runoff, including mitigation of adjacent areas outside of the county boundaries. Therefore, the DEIR is not taking into consideration the effects of the combined water-sheds which may have a significant negative impact upon water runoff in our Placer communities upon full build-out of the project plan areas.

I respectfully request the DEIR be revised to include significant studies on the impacts of this project on surrounding areas, and the Citizen Initiated Smart Growth Plan created by the Alliance for Environmental Leadership be analyzed and considered as a viable project alternative. 70-3

Thank you for the opportunity to provide comments on the DEIR. Please provide your written response to the address stated below.

Respectfully submitted,

Emily Anne Ward
2/20/19
316 Brookwood Rd,
Roseville, CA 95678

Letter 70	Emily Anne Ward February 20, 2019

This comment letter is virtually the same as the content of comment letter 54. Therefore, this response simply cross-references to responses to this letter.

70-1 See responses to comments 54-1 and 54-2.

70-2 See responses to comments 54-3 and 54-4.

70-3 See response to comment 54-5.

LFW

Letter 71

February 22, 2019

Placer County Board of Supervisors
EJ Ivaldi, Planning Director
3091 County Center Drive #140
Auburn, CA 95603

attn: Shirlee Herrington, Environmental Coordinator (email: sherring@placer.ca.gov)

Dear Ms. Herrington:

The pages that follow describe the fundamental and basic inadequacy of the Draft Environmental Impact Report for the Sunset Area Plan and the Placer Ranch Specific Plan (Project). I address some, but not all of the inadequacies.

The DEIR needs to be recirculated because it fails to comply with the requirements of CEQA, fails to mitigate for the Project's environmental impacts and fails to consider a Project Alternative that is capable of eliminating the Project's significant impacts.

The County is in the process of preparing an economic/fiscal analysis of the Project. CEQA requires, at a minimum, that the DEIR present all relevant facts regarding the Project's fiscal impacts. To continue processing the DEIR prior to completion of the economic/fiscal analysis is in violation of CEQA, because the economic/fiscal analysis could affect the project description, which could also affect the various analyses of the EIR.

The major concerns that would be addressed in the economic/fiscal impact study and that are critical include:

- Although the County/project proponent has claimed there is sufficient student demand to support a Sacramento State satellite campus, there is observational evidence that this statement may not be valid. The attendance at Sacramento State University has remained stagnant for the past decade and enrollment at Sierra College has dropped. In addition, Internet college degree curricula are becoming increasingly popular and may disrupt traditional college campuses.
- Is there sufficient funding to support the construction and ongoing operational costs of the University? Since the State University system provides minimal funding in support of satellite campuses, this will result in a significant funding obligation for the ultimate developer of the specific plan and other funding sources. What is the County's potential funding obligation?

71-1

- The economic/fiscal analysis needs to verify that the increased employment generation, increased tax revenues, labor income and annual economic output benefits cited by the County to process the Placer Ranch Specific Plan through the development review process are accurate.
- Although the County has a memorandum of understanding with the property owner of the Placer Ranch property, this may not be sufficient to guarantee full repayment to

71-2

the County plus interest. The economic and fiscal impact study needs to evaluate the long term fiscal costs to the County for funding a specific plan for a private developer, the cost of funds and whether the MOU constitutes a gift of public funds; also, does the MOU protect the County's financial interests should the property be sold?

- The potential for the Project commercial centers to have an economic impact on neighboring communities is not addressed in the DEIR. Such economic impact may include closure of stores and urban decay in existing retail centers leading to physical blight and loss of sales tax revenue to the County and Cities.

71-2 cont.

Observations related to the DEIR sections and listed impacts:

Section 3.1 Overview:

The DEIR overview fails to describe the very "nature' of this dynamic site in the "Project Description Overview". This omission allows the DEIR to perpetuate a false narrative that limits the pubic and decision makers' ability to understand how the natural systems in the SAP function. The DEIR overview must be revised to provide a description of the unique soils, edge conditions, hydrology and seasonal functions in order for the public and decision makers to conduct a meaningful review and make conclusions about the Project's impacts.

71-3

1-7 Contribution to substantial light that would adversely affect nighttime views

While the DEIR concludes that light pollution impacts will be substantial and unavoidable to Aesthetic considerations, it fails to analyze the substantial adverse impact that light pollution will pose to species. The SAP is a part of the Pacific Flyway. Migratory fowl that rely on stars for navigation use vast areas of the SAP for forage and rest. The West Placer prairie also supports the second highest density of migratory raptors. The DEIR fails to analyze how light pollution affects raptor populations - particularly owls – that rely on darkness to locate and secure prey. The DEIR fails to address the impact that light pollution will have on wetland habitats within and adjoining the SIA/PRSP (including the planned PCCP and the four mitigation sites north of the project area and mitigation areas within the Pleasant Grove Retention Basin) that are home to amphibians, such as frogs and toads, whose nighttime croaking is part of the mating ritual and is stimulated by darkness.

71-4

The DEIR fails to address the effect of light pollution on mammalian populations' survival capacity. Most mammals sleep during the day and are active at night. The DEIR must analyze the likely disruption that light pollution will have on their nocturnal activity, hunting capacity and reproductive activity.

The DEIR fails to address the impact of light pollution on human health, including disrupting circadian rhythms, melatonin levels, and generally contributing to sleeping disorders. These issues must be addressed and mitigated and until this is done, the DEIR is incomplete and inadequate.

4.2 -1 Conversion of Farmland to non-agricultural use

In the County's General Plan, the Project has long been established as a place reserved for industry and agriculture, where suburban sprawl could not transgress. Baited by a promise of a University, the County is abandoning its own best interest and is planning on opening the SA to low density urban sprawl and taking 7,295 acres of farmland with it. The DEIR fails to address how the County's intent to turn its back to the State's agland conservation policies and legislation will affect the County in the future, including what opportunities for State funding the County will forgo.

71-5

The DEIR states that farmland may be protected through the approval and implementation of a series of farmland preservation and management plans on a 1:1 ratio - which is actually a net loss

and therefore inconsistent with County General Plan policy. Additionally, the fact that the approval and implementation of these farmland preservation and management plans is speculative and that no time frame is established for approval and implementation of these plans makes mitigation measure 4.2-1a inadequate.

4.2.-16 describes a mitigation whereby mitigation lands would be protected by farmland conservation easements. This is not habitat mitigation. Farmland mitigation and habitat mitigation are mutually exclusive. Land used for farming is generally not habitat. Farms can be managed in such a way that migrating birds can use it in the fallow season (flooded rice fields), but farmland does not provide habitat for non-migratory animals. This mitigation should be removed.

DEIR is incomplete because it fails to:

- establish the cumulative impact of agricultural lands conversion in the SAP to CA greenhouse gas reduction goals.
- quantify the tonnage of GHG sequestered annually in the Project area and account for the loss of annual and future GHG sequestration value when calculating GHG generation. If the project will generate 550,000 metric tons of CO2 annually, how much CO2 sequestration is being lost as a result of development.
- quantify the tonnage of GHG to be released from soils during the construction phase of the SIA and PRSP projects
- identify the cumulative loss of greenhouse gas sequestration potential over the 80 year life of the proposed project.
- compare the projected GHG emissions from urban uses proposed in the SAP/PRSP to GHG emissions from agricultural activity (per acre, urban uses contribute 70 times more GHG than active agricultural activity) over the life of the project
- explain how, as project proponent for the conversion of 7,295 acres of agricultural land to urban uses, Placer County's ability to enforce of its own Agricultural Lands Conservation Policy will be impacted.
- consider how the loss of 7,295 acres located in close proximity to an urban center could potentially impact food production, availability and flexibility as impacts of climate change become more severe
- Consider how a projected 8' sea level rise during the 80 yr. Project build-out will affect development potential of low lying farmland.

71-5 cont.

4.4 Biological Resources

In the mitigation measures proposed to reduce impacts to biological resources, the DEIR states that the developer will hire a qualified biologist to accomplish specific mitigations. The DEIR does not establish a time frame for mitigation monitoring for specific impacts to biological resources.

The DEIR does not explain how the County will monitor the developer's mitigation compliance for accuracy, completeness or compliance with the DEIR mitigations. Neither does the DEIR explain how the County will fund mitigation monitoring or establish which County staff will be required to perform the oversight. Because it is likely that a number of separate projects by separate developers will be undertaken simultaneously, the staff requirement and cost to oversee mitigation monitoring may be substantial. The DEIR is incomplete until a process for County oversight of biological resource mitigation protections is established and defined as a mitigation.

71-6

Impacts on SAP Conservation Reserves: The SAP is home to two watersheds, the Orchard Creek, Auburn Ravine and Coon Creek Watershed and the Pleasant Grove and Curry Creek Watershed. These watersheds' summit runs generally east-west across the SAP and drain to the Sacramento River. Orchard Creek watershed drains north to four major conservation and mitigation banks -the Warm Springs Mitigation Bank (which is omitted from DEIR maps), Moor Ranch Conservancy, Antonio Mountain Ranch and Orchard creek Conservation Bank. These Banks will become part of the Placer County Conservation Plan (PCCP) area - if the PCCP is approved.

71-6 cont.

The DEIR fails to analyze the impact of the Project on the four biological resources and function. Upstream modification of the sensitive vernal pool habitat that can bring about degraded surface water quality, grading, excavation, accidental spills of hazardous substances, removal of the natural headwaters and the underlying clay pan, removal of a vernal pool complex and drainages that feed the reserves, excavation and topographic leveling, soil compaction and a general change to runoff patterns must be evaluated and mitigated in the DEIR.

4.4-6 Loss or degradation of riparian habitat

The DEIR states that no special status fish species are known or expected to occur in the project area. This is false. Recent Fish and Wildlife studies observed that juvenile winter and spring run salmon move into and use lower Auburn Ravine and Pleasant Grove Creeks (due to its warmer temperature and abundant food supply which may lead to higher growth rates and conceivably better survival of salmon).

The DEIR describes the significant effect of channelization and weir installation along of 3900 feet of Pleasant Grove Creek and the installation of control structures and the removal of all riparian vegetation and the habitat values provided herein in connection with the Pleasant Grove Retention Facility. It does not however, analyze the effect of disruption of Pleasant Grove Creek on fisheries. This activity will potentially have a significant impact on the juvenile salmon and on migratory salmon, steelhead and resident trout. The streams that will be impacted with the SAP are essential to the recovery of severely diminished winter and spring run Chinook salmon as well as sustain numerous resident trout that can transform into migratory steelhead. Numerous community organizations monitor and work actively at restoration of Western Placer streams. Ensuring adequate water flow and water quality as well as gaining year-round fish passage to and from the Sacramento River are essential to stabilizing population. With major alterations proposed to system water conveyance, governance, storage, in stream flows, mitigation requirements and fishery management, it is critical that the DEIR address potential impacts on fisheries so that populations are protected and monitoring systems are in place. The DEIR fails to provide a full analysis of impact to threatened and endangered fish species, nor does it propose adequate mitigation necessary to ensure survival of salmon, steelhead and trout populations.

71-7

Pleasant Grove Creek Channelization: The DEIR fails to analyze how channelization of 3900 feet of Pleasant Grove Creek and the removal of associated riparian forest will impact fisheries.

4.4-5 Disturbance or loss of special status species

The DEIR fails to survey for threatened or endangered insect species or consider how the removal of West Placer prairie will affect insect populations regionally and impact the function of the PCCP, Warm Springs Mitigation Bank (which is omitted from DEIR maps), Moor Ranch Conservancy, Antonio Mountain Ranch and Orchard creek Conservation Bank and mitigation habitat in the Pleasant Grove Retention Basin.

71-8

Insects are in a perilous condition according to a new global scientific review, with more than 40% of insect species threatened with extinction, while the mass of insects is declining at 2.5% a year. This catastrophic decline is an existential threat to other animals, since insects are at the bottom of the food chain and the primary food source. Habitat loss is a key driver toward this mass extinction.

The DEIR fails to analyze how the cumulative loss of pollinator habitat will impact regional farm production and food supply.

71-8 cont.

4.4-5 Monitoring Disturbance of Special Status reptile, bird, mammal and fish species

The mitigation measures proposed for special status species are inadequate. The mitigation states that if species are found during a survey or observed within the construction site, a qualified biologist shall relocate them to the nearest area with suitable habitat.

If a pond turtle, for example, is found to occupy a pond in the nesting season, the DEIR calls for a qualified biologist to relocate it to an alternative suitable habitat. The DEIR provides no protections for eggs that the Western Pond Turtle may have laid. As Western Pond Turtle eggs are buried, the DEIR should mitigate impacts to these eggs by stating that no construction activity will take place at sites providing habitat suitable to Western Pond Turtles during nesting season and the period that eggs are incubating and hatching.

71-9

4.4-8 Interfere substantially with wildlife movement

I applaud the DEIR for the mitigation 4.4-8a to create wildlife crossings for safe wildlife passage over and under the Placer Parkway. (The DEIR fails to provide similar protection for human population movement over and under the Placer Parkway)

71-10

4.7 Greenhouse Gas Emissions

Trucks v Automobiles

The DEIR fails to establish how many of the VMT will be by heavy trucks and distinguish the total GHG emission from trucks v automobiles. Because the SAP is an industrial, manufacturing and warehousing Project and will also create two regionally serving retail centers, accounting for the the number of heavy truck trips servicing and delivering and moving cargo out of the Project site is relevant to the analysis. Additionally, the DEIR fails to address the GHG impact of truck engines, which are left idling for hours of time, nor how prevailing winds will distribute this static pollution source. The DEIR fails to consider how concentration of a major manufacturing and industrial center near to schools and single-family residential uses will affect the health and welfare of these sensitive populations. The DEIR must analyze how proximity to heavy truck traffic will affect the safety and health of pedestrian and bicyclist who will share the roadways.

71-11

Heat Islands

The DEIR fails to analyze the heat island effect that will be created with development of the Project. The heat island effect affects communities by increasing summertime peak energy demand, air-conditioning costs, air pollution and greenhouse gas emissions, heat-related illness and mortality and water quality. Air temperature caused by roof and pavement surfaces warmed on a summer's day can be as much as 22 degrees warmer than the air in neighboring, less developed regions. At build out, the SAP will be 83% parking lots and roadways and 17% structures.

To combat heat island effects, the US EPA has developed specific mitigation measures, which the DEIR fails to consider.

71-12

Prevailing winds from the west in the summertime will move the atmospheric heat island across the landscape and into neighboring communities and the Sierra Nevada. The DEIR fails to analyze the impact of this phenomenon on neighboring communities and on flora and fauna in Sierra wildlands and how the atmospheric heat island will contribute to wildfire and tree mortality. 71-12 cont.

4.12 Population and Housing

The County General Plan

State law requires each community in California to provide its "fair share" of the region's housing needs through its housing element. The DEIR 4.12.2 states that between 2013 and 2021, SACOG, which is responsible for allocating the "fair share" calls upon Placer County to provide 5,031 units available to very low, low, moderate and above moderate income levels. The DEIR is inadequate because it does not indicate to what extent Placer County has achieved its "fair share". This is important because the growth area of SAP represents perhaps the best opportunity to achieve affordable housing. With the limited information available in the DEIR, it is not possible for citizens or decision makers to determine if the SAP/PRSP is moving the County toward achievement of the "fair share".

The market analysis prepared for the SAP found that a jobs housing ratio of one home to five jobs is ideal. The SACOG Blueprint calls for a 2:1 jobs housing ratio. The concept of balance is based on the assumption that if a community provides housing proportionate to the number of jobs in the community, the majority of residents would have the opportunity to work and reside in the same community. The SAP/PRSP has a 22:1 jobs housing imbalance. The DEIR fails to analyze if the 22:1 jobs housing imbalance will put upward price-pressure on all housing types - but most particularly workforce housing. The DEIR fails to adequately address the impact of this imbalance on VMT and GHG. The DEIR fails to provide decision makers and the public information necessary to determine what income groups will be most adversely impacted by the jobs/housing imbalance. 71-13

The proposed Sunset Area Plan Policy: LU/ED-4.5 encourages "the development of workforce housing to accommodate local employees, particularly housing affordable to service industry workers". Service industry workers will, in fact, constitute the majority of the 57,000 new jobs to be created in the SAP/PRSP. The DEIR fails to describe to what extent the housing needs of this population will be met in the SAP/PRSP.

Contrary to the County's own proposed Workforce Policy, in the SAP, workforce housing is permitted only by special use permit and limited to 2,500 units. The DEIR fails to analyze how the special permit status may, in itself, discourage workforce housing construction.

There are three school districts proximate to the PRSP. The DEIR fails to establish that these school districts will provide a "will-serve letter" to operate elementary and middle schools (and a University) within the one mile buffer of the MRF.

4.13-4 Increased demand for library services

The DEIR acknowledges the need for library services but fails to establish a mechanism to guarantee that one is built. The land use map for the Project designates no site for a library nor does it set up a funding mechanism for library construction and operation. The DEIR mitigates the recognized demand for library services through a mechanism called a landowner-approved special tax. This mitigation is inadequate because the library tax is discretionary and subject to developer initiative. Instead of mitigating this significant impact with a developer-initiated tax, the mitigation should 71-14

impose fees upon the developer and establish a funded plan to build a library. The proposed mitigation is inadequate. 71-14 cont.

4.14.4 Bicycle and Pedestrian System as Factor in reducing VMT

Bicycle and pedestrian routes are proposed to be established alongside major traffic arteries throughout the SAP. The DEIR fails to analyze how heavy truck traffic from the industrial uses proposed in the SAP/PRSP will impact the health and safety of bicyclists and pedestrians who may utilize these routes. Cities and Counties are increasingly providing dedicated lanes for pedestrians and bicyclists, separated from traffic with curbs and planting strips. The DEIR fails to analyze how dedicated and separated bicycle and pedestrian paths could reduce VMT on major thoroughfares including Placer Parkway, Sunset Blvd., Campus Park Blvd., Fiddyment Road and University Village Dr. 71-15

Additionally, the DEIR provides no analysis of how pedestrians and bicyclists will safely cross Placer Parkway, Sunset Blvd., Campus Park Blvd., Fiddyment Road and University Village Drive. A provision for pedestrian overcrossing and/or under crossings should be analyzed.

4.14.13 Impacts to transit

In 4.14.13, the DEIR established that demand for public transit will have a significant impact on the Project. Yet, in the 14.9 sq. mi. SAP, only one bus route is proposed, despite the stated Policy Goal TM-1 "The County will develop a balanced multi-modal transportation network in the SAP". The DEIR is inadequate because it relies on a future Placer County Transportation Agency Plan to address the significant demand for transit and because of the SAP's failure to provide comprehensive transit access based on proposed land uses and as a mitigation for significant impacts.

The DEIR is inadequate because none of the project Alternatives are smart-growth that might support a vigorous bus system supported by higher density development. 71-16

4.14-16-20 The DEIR is inadequate because all mitigation for level of service impacts call for increased capacity. The DEIR fails to consider the Institute of Transportation Studies, University of California, Davis report on Roadway Capacity and Traffic Congestion. In that Study, an increase in roadway capacity actually led to increases in VMT. The study found that when roadway capacity increases, it decreases travel time causing the quantity of driving to go up. So, the effectiveness of capacity expansion described in the DEIR as a strategy/mitigation for alleviating traffic congestion, will not actually relieve traffic congestion caused by the Project, it will increase it; and therefore the DEIR is inadequate.

4.15.13 Utilities

The DEIR fails to address the role of Pioneer Electric in the provision of electrical services to the SAP/PRSP. Pioneer Energy is listed in Table 4.15, but no further discussion of Pioneer Energy is included in the DEIR. It has come to my attention that counties discount and even offer free energy to attract developers and tenants. 71-17

The DEIR fails to establish if Pioneer Energy's policies and procedures adequately protect citizen ratepayers from subsidizing future occupants of the SAP/PRSP. This is a concern because of the potential fiscal impact on Pioneer ratepayers communitywide.

4.15-11 The potential impact on the Western Regional Regional Landfill from incompatible land use that results in insufficient permitted capacity to serve disposal. 71-18

The DEIR states pubic complaints about the MRF odors and the MRF's ability to expand are less than significant, based on a conclusion that other Material Recovery Facilities have expanded despite odor complaints. This is an inadequate response because not only is the County building a new community within the one mile buffer, it is proposing to reduce the buffer to as little as 500 feet. Nowhere in the DEIR is there a discussion of public complaints correlated to distance from the odor source. So, to simply say that other facilities have expanded despite public complaint is meaningless without context, unrealistic, subjective and inadequate. Further, the DEIR fails to address the County's own legal action to protect the MRF buffer in 1997 because its own concerns about expansion capability and the precarious legal precedent this earlier litigation sets. 71-18 cont.

2.6 Issues to be resolved

Cumulative List: The DEIR is incomplete because it does not provide a composite list of all fees and assessments and special districts connected with development of any parcel in the SAP/PRSP. The absence of this composite list leaves decision makers and the public with insufficient information to make an informed decision about project impacts. Only through disclosure of all of the fees, special districts, special taxes and assessments proposed DEIR as mitigation are developers, decision makers and the public positioned to meaningfully review and make conclusions about the Project's impacts. 71-19

Another benefit of a comprehensive list of all fees, assessments and special districts is that it will allow the public to monitor the Project to ensure that fees and assessments are adequate and fairly and consistently applied to developers.

Fiscal Responsibility: The County is in the process of preparing an economic/fiscal analysis of the SAP/PRSP. The DEIR is inadequate because it neglects to present all relevant facts relating to the Project's fiscal impact. In the absence of this analysis, citizens and decision makers have insufficient information to establish the feasibility of revenue sources, which is a CEQA minimum requirement.

Major Fiscal Concerns Include:

- PCCP fees for development of the 300 acre University parcel will exceed $40,000,000, which is twice the value of the land, raising concerns that the University is infeasible. Because it is the anchor of the Project, this may affect various analyses and minimum requirements for Project feasibility overall.
- Pleasant Grove Retention Basin. This project has an anticipated cost of $28,000,000-$39,000,000. Only a cursory and superficial discussion of the project is included in the DEIR and no analysis is provided about how project funding would be accomplished against the SAP's vague and fluctuating build out projections. 71-20
- County's proposal to largely rely on a carbon offset program to mitigate the Project's anticipated annual GHG emissions. The cost of the offset program is not specified nor is there evidence provided that the offset program would be enforceable let alone effective. Currently the Project's operational GHG emissions would require offsets costing between $370 million and $1.6 billion.
- Project Objective describes the County's intent "to generate revenue to fund countywide services" through project implementation. New development generally generates only $.04-$.64 revenue per dollar cost towards the cost to provide public goods and services. The DEIR fails to provide decision makers and the public an adequate picture of revenue generation from the Project over the 10, 20, 40 year build out projections or an analysis of the extent to which revenues from the general community will subsidize the project over the 80 year plan.

These are not trivial defects. The DEIR must be revised to identify accurate, reasonable and realistic fiscal impacts and costs and the impacts to County financial stability that will occur throughout this entire development process. 71-20 cont.

Economics of Natural Ecosystems: The DEIR is inadequate because it fails to measure, and therefore does not effectively evaluate, the benefits of ecosystem services received from the natural environment. The totality of ecosystem services and the organisms that provide them is called natural capital. Investing in natural capital and coming up with a measure of the economic value that its health and viability gives us, is an economic measure that the DEIR must consider when determining an environmental impact and whether the benefits of Project development exceed environmental benefit received from the natural environment.

Google's Earth Engine is a source of data on the value of these ecosystem services, as is Stanford University's InVEST (the integrated Valuation of Ecosystem Services and Trade-offs). These sources put a monetary value on the benefits of farmland carbon sequestration and other natural capital and offer data to allow comparison of level-field comparison of the value of habitat as compared to the businesses/development investment focused model.

Decision makers need to understand the value of ecosystem services because this is the whole picture and a way for citizens and decision makers to analyze whether or not the Project should proceed. It is the role of the EIR to explain that ecosystem services are received at no cost and yet they do have a monetary value, which is a generally understood point of reference. Additionally, the DEIR is responsible for explaining that ecosystem services benefit the whole community whereas the benefits of the Project accrue to a few. The community welfare (sequestered carbon) is reduced for a promise of future investment capital, which will not be shared across the community as equally as the farmland values were. 71-21

The DEIR's failure to monetize the value of natural systems does not give the public and decision makers all the information necessary to understand, in a holistic way, the impact of the Project. Failure to monetize environmental values also erases the value these natural systems contribute to our quality of life. It is not a one snap shot valuation, because natural systems continue to benefit the community and add community value in perpetuity.

When an environmental service, such as farmland, is lost, the economic analysis of what will replace the farmland should consider the value of the loss of future carbon sequestration and cost of the release of a lifetime of stored carbon, the human value of enjoyment of open space and the value accruing to the web of life, of which we are a part. These are quantifiable values.

Conclusion:

In circumstances like this, when all available and feasible mitigation measures have been identified, but are inadequate to reduce an environmental impact to a less-than-significant level, CEQA states that the County may not simply proceed with a finding of overriding consideration. First, the County must determine that all feasible mitigation to substantially lessen the significant effects of the Project have been analyzed. 71-22

To that end, the Alliance for Environmental Leadership put forward the Citizen Initiated Smart Growth Plan (CISGP), which we believe substantially reduces significant environmental impacts and is environmentally superior and therefore, the County is obligated to analyze the CISGP as a Project alternative.

The Citizen Initiated Smart Growth Plan achieves County Goal and objectives as set forth in the DEIR. It provides comparable business and industrial opportunity to the proposed Project through a spectrum of industrial mixed-uses that locate residences adjacent to the highest employment density in such a way that fosters community synergy. The CISGP is designed as an innovation ecosystem -providing 49,613 multi-family housing units of various typologies designed so that businesses, students and 145,000 workers are living and working in proximity for the purpose of collaboration and meeting high quality of life measures. The CISGP produces a jobs housing ratio of 3:1, as compared to the 22:1 Project jobs housing balance. In addition, a higher density of housing dramatically reduces environmental impact per capita, makes rapid bus transit possible and reduces GHG emissions by 75%. The CISGP moves the University outside of the one mile MRF smell "buffer", to an infill site where project feasibility improves, infrastructure is in place to support University development and where students will readily engage with businesses and contribute meaningfully to the innovation ecosystem. In summary, the CISGP should be analyzed as a Project alternative because it is an opportunity for Placer County to establish a future forward innovation community and achieve the objectives identified in the County's DEIR without significant adverse environmental effect.

71-22 cont.

I urge you to recirculate this DEIR, because the Proposed project lacks a revenue source and would result in severe environmental degradation. Recirculation would ensure that decision makers and the public are given the opportunity to analyze the environmentally superior CISGP. Our common goal is a thriving SA, regional benefit and generating revenue to fund countywide services.

Please insure that public comments appear verbatim in the DEIR. Thank you for the opportunity to provide comments on the DEIR, for your consideration of my request that the DEIR be recirculated and for your consideration of the CISGP.

Sincerely,

Leslie Warren
2877 Allen Drive
Auburn, CA 95602
lesliewarren52@gmail.com

Letter 71 Leslie Warren, February 22, 2019

71-1 The comment expresses concern that a fiscal/economic impact study was not included in the EIR. A market study was completed and has been available on the County's website for public review, including during the Draft EIR public review period. A copy of the market study can be found at www.placer.ca.gov under the Community Development and Resource Agency webpage. Also, see responses to comments 56-6 and 56-9 regarding financial feasibility.

71-2 The comment requests verification that the economic benefits cited are accurate, whether the County would receive repayment for the cost of funds to process the application, and whether urban decay would exist. The economic impact analysis cited by the commenter was provided to the County by the property owner. The County has not engaged a separate entity to conducts its own analysis. The County has entered into an MOU with the property owner, which states in Section D that property "Owner shall be responsible for the reasonable costs associated with the PRSP applications…the parties agree to negotiation good faith the apportionment of costs the will be reimbursed to the County through the establish of a Placer Ranch Specific Plan Fee." The PRSP fee is included within the Development Agreement for the PRSP. This comment is primarily focused on economic/financial issues and does not raise issues related to environmental impacts. The only exception is the issue raised related to urban decay. The Draft EIR evaluates the potential for urban decay in Section 4.10, "Land Use." See Impact 4.10-4, "Economic or social changes resulting in physical environmental changes," which starts on page 4.10-19. The Draft EIR's analysis is based on an Urban Decay Analysis prepared by EPS in 2018. The Draft EIR concludes on page 4.10-22 that:

The project would not result in an oversupply of any land use within the market it would serve and compete with (i.e., Retail Market rea, office and Industrial market area). Demand would support additional retail space developed as part of the proposed project. When considering other planned development, there would not be an oversupply as retail would be phased in response to adequate market demand. Even if businesses close, there is an economic incentive for owners to maintain properties and a probability that properties could be re-tenanted or repurposed for another use. Additionally, jurisdictions have ordinances and code enforcement tools to prevent and address blight. There would be no impact related to urban decay.

71-3 The comment asserts that the Draft EIR fails to describe the nature of the project site in the project description. The comment suggests that the Draft EIR does not include information related to the natural systems contained on the project site, including soil types, edge conditions, hydrology and seasonal functions. The comment notes that this information is needed in order for the public and the decision makers to conduct meaningful review and make conclusions about the project's impacts.

Each section of the Draft EIR's environmental analysis includes a discussion called "Environmental Setting" wherein the existing physical conditions (at the time the NOP was released) of the project area are described. With respect to the issues identified in the comment, Section 4.9, "Hydrology and Water Quality," of the Draft EIR provides an overview of the environmental setting on site, including disclosure of information related to the site's hydrology and water quality resources. This section describes seasonal functions related to the site and edge conditions related to hydrology and water quality. In addition, Section 4.6, "Geology and Soils," of the Draft EIR provides an overview of the environmental setting on site as well. This section describes geologic conditions, topography, soils, erosion potential, expansive soils, mineral resources, and paleontology site. This environmental setting constitutes the baseline physical conditions by which the County determines whether an impact is significant, consistent with CEQA requirements. Mitigation is identified to reduce potentially significant and significant impacts. Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable. Thus, contrary to the commenter's assertion, existing environmental conditions on the project site are described in the Draft EIR, allowing the pubic and decisionmakers to conduct a meaningful review and make conclusions about the project.

71-4 The comment states that the West Placer Prairie area supports the second highest density of migratory raptors. The comment does not provide a source for this information and does not identify the location of the area it refers to as the West Placer Prairie or provide a definition or description of West Placer Prairie or the ecological parameters that characterize West Placer Prairie. West Placer Prairie is not an area or habitat type identified in Placer County planning documents, the PCCP, the USFWS's vernal pool recovery plan, or resource agency documents and is not a vegetation or habitat type defined in any standard vegetation or habitat classification system routinely used in California, such as the *Manual of California Vegetation* (Sawyer et al. 2009) or California Wildlife Habitat Relationships system. It is not a natural community included on CDFW's current list of vegetation alliances, associations, and special stands. Therefore, these comments that apply to a resource that is not defined spatially or ecologically cannot be further addressed.

The comment also states that the Draft EIR does not analyze the effects of light pollution on migratory waterfowl that use the SAP area for forage and rest, or on migratory raptors, particularly owls, that rely on darkness to locate and secure prey. The comment further suggests the Draft EIR should analyze light pollution impacts on amphibians in wetland habitats within and adjoining the SAP area and on nocturnal mammal activities such as hunting and reproductive activity.

Upon SAP buildout, foraging habitat would be primarily absent in the developed areas where lighting would occur, so lighting would not interfere with raptor foraging (which would occur primarily in the undeveloped areas). Likewise, the vernal pool grassland complexes that provide stopover resting and foraging habitat for migrating waterfowl would be removed within developed portions of the net SAP and PRSP areas, so there would be no waterfowl resting or foraging within these developed

areas that would be affected by light pollution from project development. The remaining vernal pool grassland complexes would be located primarily in preserve/mitigation reserve land uses where no lighting would be located. Consistent with Policy 1.0.9 of the County General Plan, which discourages the use of outdoor lighting that shines unnecessarily onto adjacent properties or into the night sky, SAP Policy LU/ED-3.9: "Lighting" requires that lighting in SAP developments be designed to minimize projection into adjacent properties and onto adjacent roads and not provide a source of glare and that lighting in parking areas not exceed 18 feet in height. The proposed SAP Corridor Design Standards and Guidelines (page 4.1-16 of the Draft EIR) require that all lighting shall be Dark Sky compliant, all lighting should utilize cut-off type fixtures to minimize glare and visibility from adjacent areas, and should be the appropriate size and height given the activities for which they are designed; and signage lighting should be designed appropriately to not create hazardous glare. Therefore, light trespass into adjacent preserve/mitigation reserve lands would be minimal and would not discourage wildlife from using those areas and performing their normal feeding and reproductive behaviors, would not interfere with raptor foraging in those areas, would not interfere with bird migration, and would not reduce amphibian or mammal species survival or reproduction.

Also, see response to comment 52-2 for a discussion of impacts to human health and wellbeing resulting from light pollution.

71-5 The comment raises issues regarding farmland conversion and associated mitigation measures identified in the Draft EIR. See responses to comments 12-11 and 52-24 regarding the project's farmland conversion impact and accompanying mitigation measures. It is important to note that the Draft EIR considers this impact significant and unavoidable after implementation of the mitigation measures.

The comment also raises issues with land used for habitat conservation being used also for farmland mitigation. See response to comment 52-24, which addresses this issue.

The comment also includes a list of issues related to the adequacy of the Draft EIR. These are identified below with responses provided for each (some responses combine multiple bulleted items).

- Cumulative loss of farmland as it relates to State GHG reduction goals.

  As discussed under Mitigation Measures 4.2-1a and 4.2-1b on page 4.2-14 of the Draft EIR, all converted Farmland would be compensated on either a 1:1 or 1.35:1 acre basis. Further, the State's GHG reduction goals include all sectors of emissions, for which agriculture accounts 8 percent (CARB 2019). As discussed under Impacts 4.7-1 and 4.7-2 of the Draft EIR, the analysis considers the State's ability to meet its GHG targets. These targets are set based on a comprehensive GHG emissions inventory provided by the CARB and does not provide targets based on individual emission sectors.

- Loss of carbon sequestration (including cumulative loss).

  Implementation of the project would convert existing grassland to urban development. Annual accumulation of carbon dioxide (CO_2) per acre of grassland is approximately 4.31 $MTCO_2$ per year (CAPCOA 2016), which would be a total loss of 36,622 $MTCO_2$ per year. (Note that this is a gross estimate and does not consider the areas of the project site that would be preserved.) However, while much of the grassland would be converted to development, there would be a substantial amount of tree planting that has a much higher CO_2 accumulation rate of 111 $MTCO_2$ per acre per year (CAPCOA 2016). Considering an acre of trees would be approximately 78 trees (U.S. Department of Agriculture Forest Service 2016), the project would need to plant a minimum of 12,092 trees to match the carbon sequestration of the existing grassland. This would be about 1.4 trees per acre of the project, which would mean very sparse tree shading. It is more probable based on Placer County Landscape Design Guidelines and SAP and PRSP policies that far more trees would be planted over the project area. Thus, there would be a net benefit of carbon sequestration from tree planting than existing grasslands at the project site.

- GHG released from soils during construction.

  The amount of carbon held in soil that may be disturbed during project construction is unknown, as it is site-specific and depends on a balance between incorporation and release mechanisms (CARB 2015). There are no models approved by Placer County, PCAPCD, or the CARB that provide methodology to conduct such a calculation. See the response above for an estimate of carbon storage in grasslands, the primary vegetation type in the project area.

- Difference in GHG emissions between urban and agricultural uses.

  The GHG emissions estimate for the project conservatively assumes that there is no existing land use that emits GHGs at the project site. However, agricultural land uses in Placer County resulted in approximately 268,341 $MTCO_2e$/year in 2005 (Placer County 2018). There was approximately 126,221 acres of agricultural land in Placer County in 1994 (Placer County 1994). While a direct comparison is not possible based on available data, the agricultural GHG intensity per acre would result in approximately 2.13 $MTCO_2e$/acre/year. Based on the total acreage of the project (8,497 acres), the project site would emit 18,064 $MTCO_2e$/year. Thus, the analysis presented in the Draft EIR is a conservative estimate of emissions because it does not discount the existing emissions associated with agricultural uses in the project area.

- Impact resulting from sea level rise.

  As discussed under Impact 4.7-3 of the Draft EIR, sea level rise is not an anticipated climate change impact on the project area. The project would be at a minimum elevation of 100 feet above sea level. According to Cal-Adapt, a climate change scenario planning tool developed by the California Energy Commission, Placer County is not in any area of California that is anticipated to experience the effects of sea level rise (CEC 2019). No revisions to the Draft EIR are needed as this potential impact has been dismissed.

71-6 The comment states that the Draft EIR does not establish a time frame for mitigation monitoring and does not explain how the County would enforce mitigation or fund monitoring. Regarding enforcement and monitoring, Placer County includes all mitigation measures from a project's environmental review document in the project's Conditions of Approval (COAs). The County's Environmental Review Committee collaborates with, and is typically the same review staff for, the County's Design Review Committee (DRC) to ensure the COAs are enforced throughout project improvement plan review, construction, final map recordation, and operation, as appropriate. Satisfaction of the COAs is monitored and tracked via the improvement plan review process electronic filing system, as well as the County's electronic permit tracking system. Improvement plans are sent by the Engineering and Surveying Division (ESD) to all reviewers, including but not limited to Planning Services, Environmental Health, Air Quality, Fire, and the Department of Public Works divisions of Parks, Environmental Engineering, and Transportation, with review and signoff from each reviewer required prior to improvement plan approval. Progression through the improvement plan approval and construction process is dependent on satisfaction of the project's COAs. Planning Services staff attend ESD's mandatory pre-construction meetings with the project owner, engineer, and contractor to ensure COAs and mitigation-measure protections are in place prior to any grading activities commencing. In addition, County inspectors have the authority to shut down construction activities if COAs are not being properly satisfied. The County's monitoring and tracking of compliance with the COAs/mitigation measures are funded by the developer as part of the improvement plan review and construction inspection process. Project construction is not accepted as complete by the County until all DRC reviewers and outside agencies have signed off on the improvements.

The comment does not specify which mitigation measures lack a time frame for monitoring or mitigation enforcement mechanisms. However, mitigation measures identify implementation timing and enforcement responsibilities. Mitigation Measure 4.4-1a, for example, requires monitoring for a

minimum of 5 years from completion of mitigation, or human intervention (including recontouring and grading), or until the success criteria identified in the approved mitigation and monitoring plan have been met, whichever is longer. Many of the mitigation measures include participation in the PCCP as an option. If the PCCP is adopted and available as a mitigation strategy, the project proponent would pay mitigation fees that would fund land acquisition, mitigation projects that protect, enhance, and restore habitat, and long-term management and monitoring within the PCCP Reserve Acquisition Areas. The future Placer Conservation Authority (PCA) would oversee the implementation of the PCCP. If the PCCP is not available as a mitigation strategy, purchasing credits from an agency-approved mitigation bank would be another mitigation option. Mitigation banks are required to meet success criteria demonstrating ecological function to the resources agencies before they can be approved to sell credits. Other mitigation options include agency-approved in-lieu fee funds or land dedication, or permittee-responsible habitat establishment, reestablishment, or enhancement. Depending on the affected resource for which mitigation is sought, a state or federal agency (e.g., USACE, USFWS, or CDFW) may be consulted during development of mitigation and monitoring standards and may share responsibility for enforcing mitigation requirements with the County as specified in each mitigation measure. Permittee-responsible mitigation would require development of a compensatory habitat mitigation plan that describes performance standards to ensure success, remedial actions to be implemented if performance standards are not met, a detailed monitoring plan, and reporting requirements. Project proponents would be required to submit monitoring reports to the County that document performance standards and success criteria. The project proponent is responsible for funding mitigation and monitoring required for their respective projects, not the County. The *Proposed Placer Ranch Specific Plan Development Standard*s listed on page 4.4-34 of the Draft EIR require a long-term management plan and funding mechanism be established for the preservation of the open space preserves.

The comment erroneously states the Draft EIR did not analyze project impacts on aquatic habitat in the four conservation and mitigation banks in the northern portion of the SAP area. Indirect impacts on aquatic habitat in preserve/mitigation reserve as well as on adjacent parcels are addressed under Impact 4.4-1 and Impact 4.4-3. As stated on page 4.4-36 of the Draft EIR: “In addition to these direct losses, aquatic resources retained within or adjacent to developed land uses could be indirectly affected by grading, trenching, and creation of impervious surfaces proposed for adjacent uplands and encroachment of developed land uses. Potential indirect effects include reduction in water quality caused by urban runoff, erosion, and siltation; increased pollution, including litter and dumping and noise and light pollution; alteration of hydrologic regime through modification of surface flows or perched groundwater flows; intrusion of humans and domestic animals; changes in management regimes, such as elimination of grazing; and introduction or spread of invasive species that could result in habitat degradation. Implementation of the SAP policies would reduce the potential impacts on water quality and hydrologic regime; however, indirect effects would still occur and would diminish habitat quality and function for most species that currently use these aquatic habitats because of the encroachment of developed land uses.”

On page 4.4-44 of the Draft EIR, it is noted that: “In addition to the direct removal of habitat, implementing the net SAP could have indirect impacts on vernal pool type wetlands, as described under Impact 4.4-1. USFWS (and the draft PCCP) generally considers that vernal pool habitats within 250 feet of lands that would be developed may be subject to indirect effects unless site-specific analysis of terrain and hydrologic barriers demonstrates the immediate watershed is smaller than 250 feet around the wetland.”

Mitigation for indirect impacts is offered on page 4.4-47, including: “No project construction shall proceed in areas supporting potential habitat for Federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a BO and incidental take authorization has been issued by USFWS and the project proponent has abided by conditions in the BO, including all conservation and minimization measures.” and “The project proponents shall preserve acreage of vernal pool habitat

for each wetted acre of any indirectly affected vernal pool habitat at a ratio approved by USFWS at the conclusion of the Section 7 consultation. This mitigation shall occur before the approval of any grading or improvement plans for any project or phase that would allow work within 250 feet of such habitat, and before any ground-disturbing activity within 250 feet of the habitat."

71-7 The comment states that the Draft EIR falsely dismissed special-status fish species and did not adequately analyze the effects of the Pleasant Grove Retention Facility construction on fisheries, including threatened and endangered fish species.

The comment is incorrect that construction of the Pleasant Grove Retention Facility would remove all riparian vegetation within the facility and that it would channelize 3,900 feet of Pleasant Grove Creek. The retention facility plan would create a 3,900-foot-long high-flow bypass channel (Creekview Bypass Channel) running parallel to Pleasant Grove Creek. The bypass channel would be constructed in accordance with the *City of Roseville Creekview Specific Plan* and is necessary to collect flows from Pleasant Grove Creek, upstream of the basin, for discharge into the facility during storage events. The bypass channel would be created primarily through annual grassland habitat, but the area also contains seasonal wetlands and swales, as discussed on page 4.4-39 of the Draft EIR. Temporary construction impacts to marsh and riparian habitat would occur in areas where weirs and culverts would be constructed in the bank of Pleasant Grove Creek to allow flow exchange between the creek and the bypass channel during high flow events. As also noted on page 4.4-39, creation of these structures would result in hydrological interruption and modification. However, the hydrological modifications would be designed to maintain pre-project steam flows by diverting high flood flows into the retention facility. A low-flow return channel would be built to convey low flows back to the creek at a rate that mimics pre-project flow rates. Therefore, creation and operation of the retention facility would divert high flows but would not alter low flows in Pleasant Grove Creek such that an adverse effect on fisheries, including threatened or endangered fish, would occur.

The Draft EIR discloses pages 4.4-57 and -58 the potential indirect impacts on Central Valley steelhead and Chinook salmon that may result from construction of the retention facility. While the project would be required to implement erosion control BMPs, protect against sediment contamination of streams, and prevent spills and leaks of hazardous materials from construction equipment, the County would have no ability to enforce environmental compliance for this project within the City of Roseville. Therefore, potential indirect effects of project-related construction on steelhead and Chinook salmon habitat resulting from the Pleasant Grove Retention Facility would be significant and unavoidable though the County would coordinate with the City of Roseville regarding mitigation and compliance.

As described on pages 4.4-55 and 4.4-56 of the Draft EIR, Central Valley steelhead—the only threatened fish species in the area—is currently known to be present in the Bear River, Raccoon Creek, Auburn Ravine, and Dry Creek (including Secret Ravine and Miner's Ravine tributaries). Streams in the project area are not considered occupied by steelhead (NMFS 2014) or Chinook salmon, and suitable aquatic habitat for these species is not present. Orchard Creek in the net SAP area is hydrologically connected to occupied habitat for steelhead and Chinook salmon, and critical habitat for steelhead (migration and/or rearing habitat), outside the net SAP area in Auburn Ravine, approximately 0.75 mile north of the northern SAP boundary (at its closest point). Also, the tributary to Pleasant Grove Creek in the southeast portion of the SAP area is hydrologically connected to Cross Canal, which is also connected to Auburn Ravine. Therefore, construction and land uses proposed under SAP that may affect in-stream water quality and habitat could potentially result in indirect effects on steelhead and Chinook salmon habitat downstream of the SAP area. Potential indirect effects on downstream fish habitat include reduction in water quality caused by erosion, and siltation, contamination in stormwater returned to the creek, and hydrologic modification through increased runoff volumes and velocities. Construction activities could lead to contamination of stormwater flows (sedimentation) and potential degradation of downstream surface water quality and fish habitat. It is also described on page 4.4-55 of the Draft EIR that SAP policies and Placer County

permit conditions, as well as state and federal water quality laws and regulations would require measures to protect downstream water quality and fish habitat. Therefore, potential indirect effects of project implementation on special-status fish habitat outside the SAP area would be less than significant.

71-8 The comment states that the Draft EIR fails to survey for threatened or endangered insect species, consider how removal of West Placer Prairie would affect insect populations, and analyze how cumulative loss of pollinator habitat would impact regional farm production and food supply.

See response to comment 71-4 regarding West Placer Prairie; because this is not a resource that is defined ecologically or spatially, no further response can be provided. As identified in Table 4.4-3 of the Draft EIR, valley elderberry longhorn beetle is the only state or federally listed threatened or endangered insect species that has potential to occur in the SAP area and impacts to this species are addressed under Impact 4.4-4. Mitigation for potential impacts to valley elderberry longhorn beetle, including requiring surveys for valley elderberry longhorn beetle habitat, are presented in Mitigation Measures 4.4-4a and 4.4-4b. With regards to global declines in insect abundance, any analysis of the project's potential contribution would be highly speculative because this is a recently discovered phenomenon, the causes of which have not been systematically studied and identified. Furthermore, the regional status of general insect population numbers has not been studied comprehensively so there is no baseline data for the cumulative condition. Likewise, there is no evidence that establishes any particular importance of the SAP area as a source of pollinators for regional farm production and food supply or for the baseline cumulative condition of pollinators with regards to farm production.

71-9 The comment states that mitigation measures for special-status species are inadequate and require that a qualified biologist relocate species found during surveys. The comment uses western pond turtle as an example saying the Draft EIR should mitigate impacts to eggs by prohibiting construction in suitable habitat during the nesting, incubation, and hatching season.

Relocation of species found during surveys is only allowed for certain special-status species. Relocation of western spadefoot is an element of the mitigation strategy for this species and would be used to minimize mortality of western spadefoot in areas that would be developed. Compensation for loss of vernal pool complex habitat is another element of mitigation for this species (Mitigation Measure 4.4-3b).

Mitigation Measure 4.4-5a requires preconstruction surveys for western pond turtle in areas of suitable aquatic habitat as well as upland habitat within 200 feet of aquatic habitat that may be used for nesting. To clarify that the mitigation measure is intended to protect eggs and hatchlings as well as adult turtles, the mitigation measure for western pond turtle on page 4.4-59 of the Draft EIR is revised as shown in response to comment 16-5.

71-10 The comment expresses appreciation that the Draft EIR provides Mitigation Measure 4.4-8 to create wildlife crossings over and under Placer Parkway but notes the Draft EIR fails to provide similar protection for human population movement. The SAP and PRSP include design features to allow for appropriate pedestrian movement throughout the project area. Unlike wildlife, humans understand the danger of roadways and are able to use features such as walk signals and cross walks to safely cross even busy roads; therefore, specialized crossings beyond these typical features are not normally required for humans. Traffic hazards, including pedestrian and bicycle safety, are evaluated in Section 4.14, "Transportation and Circulation," of the Draft EIR. Specifically, Impact 4.14-14, "Impacts to bicycle and pedestrian facilities," evaluates this issue and concludes that the impact would be less than significant.

71-11 The comment suggests that the GHG emission analysis does not account for heavy truck trips to the industrial and commercial land uses proposed under the project. The mobile-source GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.1, as

explained on page 4.7-12 of the Draft EIR. CalEEMod estimates mobile-source emissions using trip lengths and trips rates, which were modified to match the results of the traffic analysis for the project, along with a fleet mix based on the project's location. In this instance, the fleet mix consisted of 79 percent of light-duty (i.e., passenger) vehicles and 21 percent of heavy-duty vehicles (i.e., trucks and buses). This data can be found in the CalEEMod results shown in Appendix K of the Draft EIR.

The comment also claims that the Draft EIR does not address the potential idling of heavy-duty trucks and associated emissions. Mitigation Measure 4.3-3a includes a requirement that all truck loading/unloading docks have power outlets to support the use of auxiliary equipment rather than idling. Additionally, signage would be posted at each loading dock that requires diesel engine idling to a maximum of 5 minutes, which is consistent with PCAPCD guidance and CARB's Airborne Toxic Control Measure set forth in CCR Title 13 Section 2485.

The comment expresses concern over potential health effects from industrial and commercial sources on nearby sensitive receptors. Impact 4.3-5 discusses the potential health risk and exposure of sensitive receptors to toxic air contaminants. Mitigation Measure 4.3-5a would reduce exposure of sensitive receptors to truck loading areas through setback requirements or the preparation of a site-specific health risk assessment showing that the associated level of cancer risk at sensitive receptors would not exceed 10 in one million. Additionally, Mitigation Measure 4.3-5b would reduce exposure of sensitive receptors to vehicle traffic on freeways through setback requirements. Also see the Friant Ranch discussion included in Chapter 2 of this Final EIR which provides clarification regarding potential health impacts for ozone precursors. No revisions to the Draft EIR are necessary.

71-12 The comment claims that the Draft EIR does not analyze the potential heat island effects from the proposed land use development. There is no available methodology to quantify the potential surface temperature increase due to the density of the buildings and land uses constructed under the project, as this requires air temperature measurements at the site where buildings already exist. Because the project is not yet built, these measurements cannot be taken to address project-specific impacts to heat island effects. Without this data, it is not possible to estimate potential increase in electricity demand for building cooling and its associated GHG emissions. Although energy consumption and associated GHG emissions cannot be quantified from heat island effects, there are several SAP policies and design guidelines intended to reduce the heat island effect, including:

- SAP Policy NR-5.9: Cool Community Strategies, which states, "The County shall promote Cool Community strategies to cool the urban heat island, reduce energy use and ozone formation, and maximize air quality benefits by requiring new development to implement four key strategies: plant trees, selective use of vegetation for landscaping, install cool roofing, and install cool pavements.

- SAP Corridor Design Standards & Guidelines, which states the project should, "Use light-colored paving surfaces to reduce urban heat island effect."

Mitigation Measure 4.7-2a of the Draft EIR requires "All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2." Thus, cool roofs would be included on all project buildings.

Because potential heat island effects would be mitigated though the policies and mitigation measures listed above, no additional revisions to the Draft EIR are required.

It should also be noted that the comment's claim that, at buildout, the SAP would be 83 percent parking lots and roadways and 17 percent structures (i.e., 100 percent impervious surfaces) is a clear overstatement, given the large areas of land protected under the Mitigation/Preserve designation and the policy requirements for open space and setbacks from creeks and wetlands.

The PRSP also includes substantial areas of open space. Landscaping requirements are also included in the SAP and PRSP, which would require vegetative cover (as opposed to impervious surfaces).

71-13 The comment states the Draft EIR fails to indicate whether Placer County has achieved its fair share of regional housing needs. The comment further suggests the Draft EIR did not analyze the effect of the jobs to housing ratio on housing prices, VMT, and GHG. Finally, the comment states the Draft EIR does not establish whether school districts would provide will-serve letters to operate schools within 1 mile of the landfill.

The Draft EIR indicates buildout of the SAP is estimated to support development of 55,760 new jobs and 8,094 new dwelling units. This translates into a jobs-housing ratio of about 7:1, rather than the jobs-housing ratio of 22:1 identified in this comment.

As described in Section 4.12.2 of the Draft EIR, the SAP/PRSP would aid Placer County in achieving the County's obligation to provide enough land with densities to accommodate the County's assigned fair share of the region's housing needs in accordance with General Plan Housing Element Policies B-4 and B-15, which require 10 percent of the housing inventory within the Specific Plan to be restricted to affordable rates, and constructed within the project area.

Draft EIR Section 4.12.2 further identifies a jobs-to-housing ratio of 1.5 is considered balanced for purposes of minimizing commuting in or out of the community for employment opportunities. (It is worth noting, that approximately 70 percent of South Placer residents commuted to locales outside of the area.) The Draft EIR accurately analyzed that if the project area was built out today it would increase the unincorporated County's jobs-to-housing ratio from 1.08 to 1.36, which is generally considered balanced, and therefore could result in fewer vehicle trips generated by commuting employees.

The intent of the project is to develop a regional center for high-quality employment, entertainment, and education. The project presents an opportunity to achieve better balance between local jobs and the local workforce. The predominantly residential areas surrounding the project house a highly skilled labor force that would find new opportunities for employment in the project.

The project's planned housing options are intended to meet different segments of market demand. In addition, numerous specific plans and other infill projects are being planned in the cities of Lincoln, Roseville, and Rocklin, and the unincorporated county, adding substantial new single-family and multifamily residential development typologies to the South Placer market adjacent to the project.

Regarding school "will-serve" letters, Section 8, "Public Services," of the PRSP describes anticipated student generation rates and designated future school facilities within the project area, and the school sites identified on the land use plan are reserved for the Roseville City School District and the district is responsible for planning each school's facilities and determining construction timing. As discussed in Section 4.13, "Public Services," of the Draft EIR, future development, including a new elementary school and new middle school, would comply with Placer County General Plan policies, including Policy 4.J.11 that requires developer coordination with school districts to ensure that needed education facilities are available for use in a timely manner.

71-14 The comment suggests that the proposed mitigation for library facilities (Mitigation Measure 4.13-4) is inadequate as it is discretionary and subject to developer initiative and suggests that mitigation should impose fees upon the developer and establish a funded plan to build a library. Mitigation Measure 4.13-4 requires developers to create or annex into an existing CFD or CSA Zone of Benefit (or combination). The measure specifically states that the chosen mechanism *shall* include a landowner-approved special tax *of an adequate amount*, or other financing mechanism acceptable to the County, to *ensure* that a funding mechanism for library services is in place to provide

adequate library services to the net SAP area and PRSP area are during all stages of development [emphasis added]. This funding is required by Mitigation Measure 4.13-4. It is not discretionary. Also, as described in the Draft EIR (page 4.13-34) a regional library is already planned as part of the Placer Vineyards Specific Plan to serve the west Placer County region, including the project area. Therefore, development of an on-site library to serve only the project would not be consistent with long-range plans for library services in the area. Note that the County has revised Mitigation Measure 4.13-4 to require additional interim library service. See Chapter 2, "Revisions to the Draft EIR," for the revised mitigation measure text.

71-15 The comment asserts that the Draft EIR does not address the effect of heavy truck trips on the health and safety of bicyclists and pedestrians. The comment also asserts that the Draft EIR does not analyze how dedicated and separated bicycle and pedestrian paths could reduce VMT on major thoroughfares. The comment suggests that the Draft EIR evaluate how pedestrians and bicyclists would safely cross major roadways, and suggests grade separated pedestrian crossings be considered. Impact 4.14-14 in the Draft EIR describes the bicycle and pedestrian facilities that would be provided along roadways in the net SAP and PRSP areas. It notes that shared-use paths are proposed along major vehicular routes, such as Foothills Boulevard, Fiddyment Road, and Athens Avenue, which would provide a dedicated facility for bicyclists and pedestrians that is separated from vehicular traffic. The SAP also requires Class II bicycle lanes on all other roadways as illustrated in SAP Figure 2-2 Bike and Pedestrian Mobility Map. Furthermore, the Draft EIR acknowledges that the SAP addresses the potential barrier of Placer Parkway by promoting grade-separated pedestrian and bicycle connections across Placer Parkway. At local at-grade intersections, marked crosswalks would be provided to facilitate safe pedestrian crossings. The planned bicycle and pedestrian facilities in the SAP are intended to provide dedicated routes that would protect the health and safety of cyclists and pedestrians.

71-16 The comment states that the SAP does not provide comprehensive transit access both to support transit travel and as a mitigation for significant impacts. The comment asserts that none of the project alternatives are sufficient to support a vigorous bus system supported by higher density development. The comment also asserts that the capacity-expanding mitigation for LOS impacts identified in Mitigation Measures 4.14-16 through 4.14-20 would not relieve traffic congestion but would increase traffic congestion. Impact 4.14-13 in the Draft EIR acknowledges that the SAP and PRSP would provide transit-supportive land uses and infrastructure. This includes high-density residential, commercial mixed-use, and campus park land uses in proximity to major transportation corridors and potential transit stops. Furthermore, the PRSP includes bus turnouts and shelters at frequent locations along arterial roadways to serve transit riders. Mitigation Measure 4.14-13a commits the County to preparing a transit master plan for the net SAP and PRSP areas that adequately serves transit demand in the SAP. This transit master plan may identify multiple fixed-route bus lines to serve the SAP area, beyond the one BRT line discussed on pages 4.14-36, 4.14-39, and 4.14-91 of the Draft EIR. Mitigation Measure 4.14-13b requires that the County also establish a funding mechanism to fund the transit service identified in the transit master plan.

Even with this transit service, project vehicle trips would generate significant impacts to traffic operations as disclosed in Impacts 4.14-16 through 4.14-20. The Draft EIR is required to identify feasible mitigation to reduce the severity of these traffic impacts. In most cases, intersection/roadway widening to adequately serve the forecasted traffic demand is a feasible mitigation measure to reduce the traffic delay. The comment acknowledges this fact when stating that increases in roadway capacity cause a decrease in travel time (i.e., a decrease in congestion).

71-17 The comment states that the Draft EIR does not evaluate whether Pioneer Community Energy's policies and procedures adequately protect citizen ratepayers from subsidizing future occupants of the project area. The Draft EIR has been revised to provide minor clarifications with respect to Pioneer Energy. See Chapter 2, "Revisions to the Draft EIR." These minor changes did not alter any of the conclusions of the Draft EIR.

71-18 The comment disagrees with the conclusion of Impact 5.15-11 regarding impacts on the WRSL from incompatible uses and states that the Draft EIR fails to discuss the correlation between public complaints and distance to odor sources. The comment also notes that the Draft EIR does not address the County's own legal action to protect the MRF buffer in 1997.

Because odor issues relate to different types of potential environmental impacts, odor-related impacts are addressed in three different sections of the Draft EIR: 4.3, "Air Quality"; 4.10, "Land Use"; and 4.15, "Utilities." Impact 4.15-11 focuses on the project's potential to adversely affect operation of WPWMA facilities. The comment's criticisms of Impact 4.15-11 related to distance to sensitive receptors are addressed in Impact 4.3-6, which is part of the Draft EIR's air quality analysis, and Impact 4.10-2, which is part of the Draft EIR's land use analysis. Also see Master Response 4: Odors.

The commenter also indicates that the Draft EIR did not address the previous court case related to the landfill buffer. California Resources Agency website provides the following summary of the case, *Placer Ranch Partners v. County of Placer*, Cal.App.3d (2001):

> Developers filed a petition for a writ of mandate challenging the county's certification of a final environmental impact report concerning the county's general plan update. Plaintiffs claimed that the environmental review did not meet the requirements of the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.), and that the county acted arbitrarily in prohibiting residential development within one mile of the county's landfill. The trial court denied the petition. (Superior Court of Placer County, Nos. SCV-2519 and SCV-2828, James D. Garbolino, Judge.)
>
> The Court of Appeal affirmed, holding that the county's decision regarding the one-mile buffer zone around the landfill was supported by substantial evidence. The court held that the question on appeal was not whether the buffer zone was necessary or whether a smaller zone would adequately accommodate the conflicting land uses; rather, the question was simply whether the propriety of the one-mile zone was a fairly debatable question, upon which reasonable minds could differ. The court held that the county's decision regarding the size of the buffer zone was supported by substantial and relevant evidence, even though no scientific evidence was presented on the issue. (Opinion by Hull, J., with Blease, Acting P. J., and Callahan, J., concurring.) (California Resources Agency 2019)

As described, the decision did not center around the specific buffer distance, or the need for the buffer itself; it focused on whether reasonable minds could differ about the need for the buffer and the identified one-mile buffer distance and whether the County's decision was supported by substantial evidence.

71-19 The comment requests a list of all fees, special districts, special taxes, and assessments proposed as mitigation. A financial plan has been prepared for the PRSP and will be available for the Board of Supervisors deliberations. This comment does not raise issues related to environmental impacts.

71-20 The comment reflects fiscal concerns. The suggestion that the PCCP fees for the SAP/PRSP would be $40 million are inaccurate. See response to comment 56-6.

Costs to participate in the Pleasant Grove Retention Basin would be negotiated with the City of Roseville as the basin is owned by the City of Roseville. Section 2.3, "Required Permits and Approvals," of the Draft EIR states that an "agreement with City of Roseville for outlining fair-share obligations for off-site retention at the Pleasant Grove Retention Facility" would be required. Master Response 6, "Drainage and Flooding" and Master Response 9, "Mitigation and Development Fees" provide additional detail regarding the funding and timing of the Pleasant Grove Retention Basin.

Regarding GHG offset program feasibility, see response to comment 12-12. See response to comment 71-9 regarding a financial plan.

71-21 The comment states that the Draft EIR does not measure or evaluate the economic benefits of ecosystem services received from the natural environment (e.g., farmland, sequestered carbon, open space). Regarding economic impacts, financial issues such as these are not a physical environmental effect under CEQA and are not required to be analyzed in an EIR or other CEQA analysis. The Placer County Planning Commission and Board of Supervisors will weigh the environmental impacts (including those related to public interests) and benefits of the project when making decisions regarding the project. The decision documents (including the CEQA Findings, which are described in response to comment 36-3) will provide the decisionmaker's detailed rationale on how the project would or would not serve the public interest.

71-22 The comment summarizes CEQA requirements for mitigation measures, but the summary is not entirely correct. See response to comment 54-1, which correctly describes CEQA requirements for mitigation measures. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts, including the requirement for lead agencies to prepare findings and, if the project would result in significant and unavoidable impacts, a statement of overriding considerations. The Draft EIR identifies feasible mitigation measures to minimize significant impacts (see Table 2-1 in the Executive Summary for a summary of these mitigation measures). Additionally, this Final EIR evaluates the feasibility of additional mitigation measures suggested in written comments on the Draft EIR to further reduce significant impacts. Nonetheless, the Draft EIR identifies (in Section 5.1) those impacts that cannot be reduced to a less-than-significant level, even with mitigation.

PRC Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives and/or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” The same statute provides that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 goes on to provide that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

Thus, the commenter’s statement that the County must determine that all feasible mitigation measures have been analyzed is an explicit part of the CEQA process and, therefore, the County’s project approval process. Analysis of feasible mitigation measures is included in the Draft EIR, the Final EIR, and, if the project is approved, will be included in the CEQA findings.

Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity

William Michael Wauters

Building Construction & Repairs
Inspection Services

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700 Clipper Gap Road
Auburn CA 95603-8471

Phone/Fax
(530) 878-9335

Letter 72

Chair and Members of the
Placer County Planning Commission
3091 County Center Drive #140
Auburn, CA 95603
Attn: Shirlee Herrington, Environmental Coordinator

20 FEB. 2019

Dear Ms. Herrington and Chair and Members of the Placer County Planning Commission:

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

DOCUMENT DUMPING. THE ROLL OUT OF THIS FAULTY DEIR WITH THE HUGE VOLUME OF PAPER AND SHORT TIME SHOWS CONTEMPT FOR CITIZENS ATTEPTING TO RESPOND.
PLEASE — REVISE THE DEIR AND GIVE MORE TIME. 72-1

COUNTY DECEPTIONS IN DEIR POWER POINT
Page 7: "CAPITALIZE ON PROXIMITY TO HWY 65, RAILLINES,"...
— THERE IS NO USAGE OF RAIL LINES IN THE DEIR. NONE, NOT FOR PASSENGER OR INDUSTRIAL, OR A DUMP RAILSPUR.
— WHERE IS ANY STUDY OR ECONOMIC EVALUATIONS REGARDING CUTTING OFF THESE MENTIONED POSSIBILITIES
(PAGE 7:) "IN 2002 P.R. PARTNERED WITH SAC STATE"..... ?
— NOTHING HAS COME OF THIS OR LATER "PARTNERSHIPS".
— REMOVE THIS BLATANT UNCONSUMATED "DEAL" FROM THIS SUPPOSEDLY FACTUAL REPRESENTATION FOR DEIR. 72-2

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR.
Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Thank you, WMW

— WILLIAMWAUTERS@YAHOO.COM

William Michael Wauters

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I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County: REAL ALTERNATIVES

IT MUST BE VERY EMBARRASSING FOR SENIOR PLANNERS TO BE PRESENTING A "PLAN" WITH SO MANY PROBLEMS THAT THEY ADMIT ARE "SIGNIFICANT AND UNAVOIDABLE IMPACTS", FOR THE WHOLE AREA. THAT BIG MISTAKES WERE MADE BY DECADES OF PREVIOUS PLANNERS AND SUPERVISORS DOES NOT MEAN THAT GOOD MODERN PLANNING CAN NOT BE ADOPTED NOW, WITH A REVISED DEIR. PLEASE ADD THE A.E.L. CITIZEN INIATED SMART GROWTH PLAN BECAUSE IT IS A MUCH BETTER WAY TO MEET THE SAP GOALS. 72-3

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR.
Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County. Thank You - Will

— WILLIAMWAUTERS@YAHOO.COM

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— THE DREAM OF A UNIVERSITY IS FLOATED IN THE DEIR. WHERE ARE ECONOMIC STUDIES CONFIRMING THIS WILL BE VIABLE? HOW ARE BRICK AND MORTAR SCHOOLS PROJECTED TO DO IN THE ADVANCED DIGITAL AGE? STUDIES? 72-4

— POWER POINT SLIDE #20; "PLACER PARKWAY" SHOWS A COUNTY OWNED PARCEL OF A MULTI-HUNDRED ACRE PARCEL LABELED; "REGIONAL UNIVERSITY", BETWEEN REASON FARMS AND PLACER VINEYARDS. PLEASE ADD THIS TO YOUR DEIR REVISION WITH EVALUATION OF BOTH SITES, RATING DESIREABILITY OF BOTH. 72-5

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR.
Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County. Thank you — WMW

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I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County: REGARDING "ECO-INDUSTRIAL"

— WHERE ARE STUDIES AND MAPS OF THE FUTURE EXPANSION OF THE LANDFILL? PLEASE PROVIDE.

— THE WRSL WILL FILL WAY BEFORE 80 YEARS? IF SO, WHAT WILL PLACER COUNTY DO TO SORT TRASH, RECYCLABLES AND COMPOST FOR ALL WESTERN RESIDENTS? PROVIDE ALTERNATIVES.

— IF NO ALTERNATIVES EXIST, WHAT ABOUT THE REALITY THAT WRSL WILL BE A PERPETUAL SORTING AND COMPOSTING FACILITY? PRESENT COUNTY PLANS.

— PLACER COUNTY SOLID WASTE WILL HAVE TO BE TRUCKED FAR AWAY. WHAT ARE THE COUNTY WIDE POLLUTION PROBLEMS FROM THIS? WHAT ABOUT EXPANDING THE WRSL TO MORE LAND? EVALUATE A RAIL TRANSPORT SPUR TO WRSL.

72-6

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR.
Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Thank you, WMW

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I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County: RAILSIDE INDUSTRIAL ZONING

— IN PLACER COUNTY, INDUSTRIAL ZONING IS A LIMITED, HARD TO SITE REAL ESTATE VALUE. RAILSIDE PLOTS STILL ACCESIBLE EVEN RARER.
— WHAT IS THE ECONOMIC VALUE OF THESE RARE RESOURCES NOW AND IN FUTURE?
— WHAT DOES OUR COUNTY LOSE IF WE CUT OFF THIS LIMITED ZONING TO THE RR?
— NOW IS THE TIME TO ADD A FUTURE WRSL INDUSTRIAL RAIL SAUR PATH TO THE SAP. PLEASE DO SO, WITH MAPS OF EXISTING R.R. SIDINGS.

72-7

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership's Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR.
Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County. Thank you WMW

— WILLIAMWAUTERS@YAHOO.COM

Letter 72	William Michael Wauters February 20, 2019

72-1 The comment expresses concern about page limits and requests an extension of the comment period. See response to comment 32-1 regarding these topics.

72-2 The comment raises several individual issues, including that the Draft EIR does not identify a rail line, that nothing has come from partnerships with Sac State or other partnerships, and that the "deal" should be removed from the staff presentation. The comment suggests that the Draft EIR should be recirculated and that the CISGP should be analyzed. Regarding the rail line, the comment is correct that the Draft EIR does not identify a new rail line. Although the PCTPA has a planned capital corridor expansion, the plan does not identify a rail line in the SAP area. Also, such a line would not fall under the jurisdiction of the County and is not identified in any local or regional transportation plans. Regarding County partnerships, this does not constitute an environmental issue and is therefore not discussed further in this response. Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan.

72-3 The comment refers to the project's significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts. Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative. Also see Master Response 8: Recirculation.

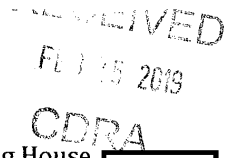
72-4 The comment asks how brick and mortar schools are projected to do in the digital age. See response to comment 56-6.

72-5 The comment requests that Regional University be added to the evaluation of sites in the Draft EIR. Regional University is not owned by the County. Regional University is an approved specific plan with a certified environmental document that is separate and distinct from the PRSP.

72-6 The comment raises questions regarding the landfill expansion details and questions what alternatives exist for solid waste disposal if closure of the landfill occurs within the SAP's 80-year buildout horizon. The comment also asks about the landfill's potential role as a sorting and composting facility and also about the potential impacts related to hauling solid waste to a different facility. See response to comment 31-13 regarding the lack of availability of detailed landfill expansion plans. Regarding future closure of the landfill, the Draft EIR states (page 4.15-69) "based on WPWMA's estimate of future disposal rates, WPWMA believes sufficient disposal capacity at the WRSL will be available until 2058." An attempt to forecast a solid waste disposal scenario beyond 30 years, especially without knowing details of the WRSL expansion plans, would be speculative. The Draft EIR concludes that the impacts related to increase in demand for solid waste service, both on an individual project level (Impact 15-6) and a cumulative level (Cumulative Impact 4.15-17), are less than significant; therefore, there would be no foreseeable need to haul solid waste to a different location, and analysis of impacts related to hauling solid waste are not necessary.

72-7 The comment requests an additional railroad spur site in the SAP. Rail access is currently within the SAP. The proposed SAP does not limit rail access sites. The railroad line is controlled by UPRR, which is a separate entity that determines whether or not additional rail spurs will be located or expanded upon.

3.2.4 Late Comments



Re: Sunset Area Plan/Placer Ranch Specific Plan DEIR Report – State Clearing House No.2016112012. Vol. 1 & 2

Letter 73

Dear Shirlee Herrington,

Yet another disaster looms for Placer County because of totally incompetent planning. Whatever planning is done seems driven by greed, and greed is rather distant from common sense and fairness.

Whatever happened to the preservation of agriculture that the county espouses so vehemently in its Placer County Agricultural Plan? Obviously there is no value in so many feeble minds regarding agriculture, the very industry that feeds us. So, 8,000 more acres of open space is cast aside as progress when it is covered with roads, housing tracts, big box stores, and more. What is proposed is not progress.

Millions of dollars have been totally wasted in this projected plan. Meanwhile, Ascent Environmental has taken the taxpayers of Placer County to the bank, and no doubt they have laughed all the way. Their work is a sham, and taxpayers have been scammed.

Developments like this NEVER pay their way. Open space ag land costs very little in services demands in terms of infrastructure and everything else – law enforcement, fire services, schools, etc. – that are a part of development. 73-1

Effectively more transportation disasters will be a part of the idiocy this plan represents. Just look at the I-80 – Hwy. 65 debacle, and similar is in the cards.

The minions who have thrown this plan together have totally failed the taxpayer. This happens time and time again in Placer County because its esteemed planners are incompetent beyond belief. Your DEIR is incomplete and a disaster, not to mention a waste of colossal sums of taxpayer monies.

The public trust is gone. You too should be gone, along with every "expert" who has any effort at all in this project.

Greed needs to be displaced with a measure of sensitivity. Placer County does not need this disaster. Throw it out in its entirety and learn something from the realization that more, more, more is not a plan.

Letter 73	Unknown February 25, 2019

73-1 The comment expresses opinion regarding the merits of the project. Environmental issues raised are general in nature. No specific issues are raised regarding the adequacy of the Draft EIR's analysis and conclusions. No further response is warranted.

Letter 74

Mike Parker

From: Leslie Warren <allianceforenviroleadership@gmail.com>
Sent: Thursday, June 27, 2019 2:39 PM
To: Mike Parker
Subject: Phase 2 CISGP

Dear Mike,
How are you today.
I'm wanting to greet you and introduce myself; as I am representing the Alliance for Environmental Leadership.
I also pleased to share Phase 2 of the Citizen Initiated Smart Growth Plan with you.
If you have questions on it, or on oPhase 1 of the CISGP, please do not hesitate to contact me at (530) 878-07308.
On another subject, I am looking at the SAP DEIR CO2 generation projections. W gas generating 20 lbs. per gallon burned and diesel, 23 pounds of CO2 per gallon, your projection of new tonnage of CO2 per year seems low considering the 800,000 new daily vehicular trips. How many miles per day did you estimate each vehicle would be driving and what was the car v diesel truck break out-and how many hours would the trucks be idling -not moving in the roadways? Do you still think your DEIR estimates are correct?
Thanks for getting back to me!
Leslie Warren

74-1

74-2

Citizen Initiated Smart Growth Plan: Phase 2

Housing and Jobs. You may access the document here.

bit.ly/CISGP_2

Letter 74	Leslie Warren June 27, 2019

74-1 The comment is an introductory remark by the commenter, as a representative of the Alliance for Environmental Leadership. The commenter has attached a document titled, "Phase 2 of the Citizen-Initiated Smart Growth Plan." Phase 2 of the CISGP relates primarily to affordable housing and does not relate to environmental issues.

74-2 The comment questions the estimate of mobile source-related GHG emissions from new daily vehicular trips. Specifically, the comment seeks clarification in the daily VMT, the fleet mix, and idling times assumed for quantification purposes. As discussed on page 4.7-12 of the Draft EIR, GHG emissions were modeled in the CalEEMod using the estimated levels of VMT provided in the traffic impact analysis conducted for the EIR. Daily VMT associated with project buildout was assumed to be 3,624,520 as shown in Table 4.14-32 of Section 4.14, "Transportation and Circulation," of the Draft EIR. CalEEMod generates emissions estimates from mobile sources based on the fleet mix for a specific geographical region provided by CARB's Emissions Factor 2014 model. A fleet mix is the composition of different vehicle types used based on a percentage of all vehicle types on the road. The fleet mix assumed in the CalEEMod modeling is provided in Appendix K for each CalEEMod output file under Table 4.4, "Fleet Mix." Regarding the assumptions about idling, particularly for large trucks, CalEEMod uses EMFAC 2014 emission factors for vehicle running exhaust, engine start exhaust, and idling exhaust. These emission factors are specific to the vehicle type, the year in which the modeling was conducted, as well as the geographical region.

3.2.5 Public Hearing on the Draft EIR

Letter PH

PLACER COUNTY PLANNING COMMISSION

COMMUNITY DEVELOPMENT RESOURCE AGENCY

CERTIFIED COPY

PLACER COUNTY SUNSET AREA PLAN/PLACER RANCH SPECIFIC PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (PLN15-00283/ PLN16-00341), PUBLIC REVIEW AND COMMENT SUPERVISORIAL DISTRICT 2

_____/

Reporter's Transcript of Proceedings

LOCATION: Planning Commission Hearing Room
3091 County Center Drive
Auburn, California

DATE AND TIME: Thursday, February 14, 2019

Reported by Lori G. Pinkerton, CSR No. 6031

APPEARANCES

PLANNING COMMISSION MEMBERS:

JEFFREY MOSS, CHAIRMAN

SAMUEL CANNON

RICHARD JOHNSON

ANDERS HAUGE

WAYNE NADER

ALSO PRESENT:

E.J. IVALDI, Planning Director

---o0o---

P R O C E E D I N G S

---o0o---

CHAIRMAN MOSS: Good morning everybody. Welcome to this February 14th meeting of the planning commission. If you'd all stand and please join me in the flag salute.

(Flag salute.)

CHAIRMAN MOSS: Thank you. Roll call, please.

COMMISSION SECRETARY: All right. Mr. Cannon.

COMMISSIONER CANNON: Here.

COMMISSION SECRETARY: Mr. Johnson.

COMMISSIONER JOHNSON: Here.

COMMISSION SECRETARY: Mr. Nader.

COMMISSIONER NADER: Here.

COMMISSION SECRETARY: Mr. Hauge.

COMMISSIONER HAUGE: Here.

COMMISSION SECRETARY: And Mr. Moss.

CHAIRMAN MOSS: Here.

Report from the planning director. Morning, E.J.

MR. IVALDI: Good morning. E.J. Ivaldi, planning services division. I think Mr. Sevison, Commissioner Sevison was gonna also try to make it down

today, but given the weather over the Summit, I'm not sure that's going to happen, especially given my drive up here this morning.

So anyway, glad you're all here to make it. Just a few quick items this morning, update on a board meeting that happened last Tuesday or actually on February 5th, as you recall, the third-party appeal of the Habad of Roseville was scheduled at that hearing. The board did not hear that item that day. There was an issue with public noticing and the 300-foot surrounding property notice. So what they did, they continued that to an open date and a new date has not been set yet for that.

The next board meeting is going to be February 26th. The board will consider the Placer -- the hearing's properly (unintelligible) specific plan amendment at that hearing. That is scheduled for 10:10 that morning. And then the other item is the first of several zoning text amendments, which our commission recommended approval of last year. As you recall, the board, when we got to the board late last year, they decided they wanted me to break that up into increments just so it's more digestible to the public and to the board itself. So at that hearing, we're going to be taking the ground-mounted solar and cellular facilities,

those zone text amendments. And that is scheduled for 10:30, February 26th.

So our upcoming planning commission meetings, you might be happy to hear that we will not be going to Tahoe on February 28th. We're going to be canceling that meeting. So the next planning commission meeting that is scheduled will be here in Auburn. That's going to be on March 14th. A couple projects that might be of interest that will be on that agenda, the Placer County Government Center master plan, and then also one of the White Hawk projects down in Granite Bay.

So for today's meeting, we have two draft EIR items that were scheduled. I know the chairman will go over the protocol prior to each of those items today, but for those in attendance that would like to provide public comment, we have sign-in sheets over here to my left. I've already seen a number of people utilize those. So anybody else who wants to get on those lists, please now would be a good time to do that.

And also, you will notice we have a court reporter here who is here to -- for the first item. She says that she can go quite long, an hour and a half, but at some point, if she needs a break, we may need to take a short intermission.

So that's all I have. Do you have any

questions?

CHAIRMAN MOSS: Questions? No.

MR. IVALDI: All right. We can get started. Thank you.

CHAIRMAN MOSS: All right. Now is the time in the meeting for public comment. Anybody who would like to make a comment that is regarding anything that is not on today's agenda is welcome to come forward and do so.

MR. ROOD: Good morning, Mr. Chairman, members of the commission my name is Bart Rood.

CHAIRMAN MOSS: One moment, if you would, please. Just a matter of protocol, the hearing is for public comment. As well as most things of this meeting, we will try to limit the time for each speaker to three minutes, please.

Go ahead. Thank you.

MR. ROOD: Thank you, sir. Good morning, Mr. Chairman and members of the commission. My name is Bart Rood, Kramer Road, Auburn. I am a member of Protect Rural Placer. You have probably heard of us. And our interest, of course, is the proposed parking lot to be located at 5345 Bell Road. That would be a parking lot that would provide additional access to Hidden Falls Regional Park.

We are opposed to the parking lot. We're

opposed to the extension of the trail system from Hidden Falls Regional Park, because that amounts to urbanization of an agricultural area. As you're aware, that area has been in agriculture since the 1850s. The Rood Family farm is adjacent to that particular area.

So I appreciate the opportunity to speak to you. This has not become an issue that has been discussed publicly to a great deal. We are proactive. We do not want to be reactive. The whole idea of the review of the SEIR was to have been in October, and now it's delayed until May, perhaps May of 2019. And so time moves on. Last word, the supervisors meeting, February 5th, the board of supervisors approved an additional $50,000 of expenditure towards this SEIR project. And I want you to please understand that the ag folks in Placer County are few in number. We are far outnumbered by equestrians, by hikers and by mountain bicyclists. We hope that you will listen carefully and preserve agriculture in Placer County and protect rural Placer County. We appreciate your time and thank you very much.

CHAIRMAN MOSS: Thank you.

MS. ROOD: Good morning. My name is Delana Rood. I live in North Auburn on Kramer Road. My family's ranch is directly across Bell Road from the

entrance to the proposed Hidden Falls Regional Park expansion parking lot for 100 cars, 40 trucks and trailer rigs, a stable, bike concession, restrooms and more. I am also part of the Protect Rural Placer group.

According to Cal Fire, almost 85 percent of fires in California are human caused, and of that, 7 percent are arson. A wildland fire can travel from about 6 miles an hour up to 14 miles an hour and perhaps more. This proposed trail expansion is in a rural area of Auburn that has limited access. The total of the proposed Hidden Falls Regional Park expansion trail extension is to cover 3700 acres with 60 miles of trails. There is 3600 acres of private property right in the center known as Big Hill.

This area covers dry oak woodlands and heavily wooded brushy hills and gorges that are extremely combustible with very little access for firefighters. We believe with 3700 acres and 60 miles of trails, there could easily be over 1,000 people on a single, busy day on these trails. It will be very likely that some hikers will make it a two-day hike and leave the trail to camp out. This will create a high potential for wildland fire from camp fires.

Additionally, there is a high potential for homeless camps in such a large trail network. And I

might tell you that we've already had homeless people camping on the backside of our ranch on Ore Creek. All of this is to go on with no park ranger, no law enforcement to monitor the activity in the Big Hill area. The proposed expansion is less than four miles from the densely populated Highway 49 business district, the county facilities here at DeWitt, the hospital, several schools and a multitude of convalescent facilities as well as thousands of people who work and live in the area.

Remember, a fire -- wildland fire can travel at a rate of 6 to 14 miles an hour. Can you imagine trying to evacuate all of North Auburn in an hour? Perhaps you remember the Forty-Niner fire right across the highway here eight or nine years ago. I watched it from a hilltop, and I can tell you that I and my neighbors were pretty scared about the possibility of that leapfrogging.

We have been safe so far, because there is no public access to this remote wildland area. Unsupervised public access will clearly increase the potential for fire. Our other big concerns are the roads and cost. I ask that you recommend to the board of supervisors that they deny this regional park expansion. By doing so, Placer County will show they

are taking steps to protect the people --

CHAIRMAN MOSS: Thank you.

MS. ROOD: -- that live here and prevent a catastrophic fire. Thank you.

MS. KIET: This is Valentine's Day, and I've never done anything like this on a Valentine's Day. So this is unusual. My name is Jean Kiet. I've been here before. I live at 5395 Bell Road, which is next door to 5345 Bell Road. And I have found that most of the people that listen to us, if they're listening, if you're listening, have never had any questions, have never had any comments. I realize this is a formal meeting, but it's very difficult when you're living in a place where you have all of these fears of what's going to be happening, and you get absolutely nothing.

This environmental impact review is -- report is taking forever, and one of the reasons for that is, as you heard, the park's administrator, after listening to all of us who object to this development in our community, has been adding and adding and adding as things come up to the contract. And now, he's gotten approval for a $50,000 addition in order to complete the environmental impact. That's necessary in order to finally get it, if we get it and if he stops adding once we keep telling him what we object to.

Also, you may have gotten a little note from me showing that the survey that came out of their department is totally inapplicable. They're not enough responses in that type of a survey, when you look at the size of our county, to really be significant. So there is an awful lot that has been going on from day one that is inappropriate and is not on behalf of the property owners and the local residents.

I've asked people, commissioners and others, "Have you gone out and looked at the property? Do you know what we're talking about? Have you looked around to see all of the other properties surrounding this?" When you turn off of Bell Road onto 5345, there is a small driveway. It's not real wide. It only goes as far as the house on the top ten acres. There has never been a road in this particular area. That's not a road. It's a driveway. And the back part of the property, which is the 40 acres, has never had a road. So this is not an appropriate access. Thank you.

CHAIRMAN MOSS: Thank you. All right. Is there anybody else who would like to make a public comment that is not on the agenda today?

MR. GAVNEY: Good morning. My name is Wally Gavney. I live at 4961 --

CHAIRMAN MOSS: Sorry, Wally.

MR. GAVNEY: That's okay. I live real close to this proposed parking lot. I can get there in three minutes. What we have here, in my mind, is a couple problems. One is it's zoned residential ag. I don't know where a parking lot comes into play there. The other issue I think we have is on Marysville, the other access and parking lot has a lot of problems still. So I'm not sure why, which is opening up another can of worms when we haven't fixed the first.

Anyway, I'm vehemently opposed as much as all my neighbors here. I oppose that twilight parking lot. And thank you for listening.

CHAIRMAN MOSS: Thank you. Anyone else?

Okay. With that, we will close this portion and move on to the consent agenda then.

COMMISSIONER JOHNSON: I'll make a motion.

COMMISSIONER HAGUE: Second.

CHAIRMAN MOSS: We have a motion and a second. Roll call, please.

COMMISSION SECRETARY: I have a motion by Mr. Johnson and a second by Mr. Hague.

So Mr. Cannon?

COMMISSIONER CANNON: Yes.

COMMISSION SECRETARY: Mr. Johnson?

COMMISSIONER JOHNSON: Yes.

COMMISSION SECRETARY: Mr. Nader?

COMMISSIONER NADER: Yes.

COMMISSION SECRETARY: Mr. Hague?

COMMISSIONER HAGUE: Yes.

COMMISSION SECRETARY: And Mr. Moss?

CHAIRMAN MOSS: Yes.

Okay. We're now coming up to our 10:05 item with Placer County Sunset Area Plan and Placer Ranch Specific Plan. When it gets time for public comment, I would like to remind you to keep your comments only on the environmental impact document. We will ask that you sign up prior to and wait until your name is called to speak. Limit these comments to three minutes for an individual. If you represent a group or organization, that time limit will be extended to five minutes.

We're not going to yield or share or allocate other people's time towards an individual already speaking, so we'll stick with the three and five minute limits. The yellow light is giving you your last minute warning and telling you it's time to kind of wrap up your thoughts and do it, but we will try to hold very strictly with these time limits.

And I think that's kind of got the basic rules covered. It's all yours.

MS. JACOBSON: All right. Thank you,

Mr. Chairman.

Good morning members of the commission. My name is Crystal Jacobson. I am a civil planner with the planning services division here today to present to you on the draft environmental impact report for the Sunset Area Plan and Placer Ranch Specific Plan. As you had just noted, the meeting purpose here today is to receive comment on the draft environmental impact report prepared for this project. The CEQA guidelines do encourage counties and cities to hold public hearings on environmental documents and so that has been our policy for years to do that.

And today this hearing is, again, just to focus on the draft environmental impact report. Certainly here to answer questions that you might have on that analysis and then to accept comments, but not to get into the merits of the project.

So I am joined today by a number of folks who are part of our planning team. Michelle Kingsbury with the County Sacramento office is here. She'll be assisting with the presentation along with Vance Jones from McCane and Stumps, a consultant that helped with the preparation of the Placer Ranch Specific Plan project, so he will also present. And then we also have our environmental consultant with (unintelligible)

Environmental here today. Mike Parker is the lead on that and various technical experts. So if something comes up on an item that I am not able to adequately answer your questions, we can certainly call on someone else to do that. So we have technical experts on staff and also consultants in the room.

So this slide just kind of highlights the public notification process for this. It's very standard in our office. Property owners within 300 feet of the project boundaries. All folks who have commented on this process has been underway since late 2016, so we have a number of folks on our e-mail distribution list. Those folks have been providing comment along with some key stakeholders in cities and other agencies. And then I did want to point out, we did provide copies of the DEIR to a number of different libraries that kind of went above what we typically do for the -- providing those documents in the libraries, and we also provided some copies for check-out. So people were able to actually check out the copies and take them home with them.

This is a graphic that shows the existing vicinity of the Sunset Industrial Area plan. It's out in West Placer, I think, as you know. So the area in red is the existing boundary of the Sunset -- what we

call the Sunset Industrial Area Plan boundary. We have the city of Lincoln to the north, city of Rocklin to the east and city of Roseville to the south here. This area that you see kind of in gray or purple is the Placer Ranch Area, so meshed within the Sunset. This slide here shows the proposed boundary. You can see it has been expanded here, and I'll talk a little bit about that in a minute. But here is the Placer Ranch site. So it's within the south area of Sunset. And you'll see 65 and then 80 over here.

So by way of background, this area has always been anticipated for development, largely slated for industrial, although there is some agriculturally zoned areas to the west of the site. And so the intent really in the existing Sunset Industrial Area Plan is that this site is to promote economic development providing opportunity for job growth in the region. So there is a lot of policies, existing policies in that plan. I'll speak to that.

So the long term really dates back -- actually dates back to over 50 years to create that employment hub in South Placer. The idea is to capitalize on the proximity of Highway 65, the rail lines and the nearby growing communities of West Placer. So the first formally adopted plan was this 1997 plan that we are

updating now. In 2002, Placer Ranch partnered with Sac State to bring a university to that site. So Placer Ranch has been kind of in and out of process for a long time, and I think Michelle will touch on that. But then in 2014, our board initiated an update to the Sunset Area Plan -- Industrial Area Plan. Really, the purpose was to re-brand that area and establish a new vision and development plan. The objective is really to reposition the land to attract some new users, achieve economic development and create jobs. And then Placer Ranch was added to the work program in 2016 by a direction from our board or with direction from our board. And really, Placer Ranch project has revisions for our public universities, critical backbone infrastructure, which would really catalyze the job creation and economic growth through the Sunset Area. So that's really the reasoning behind that decision.

So just some key visioning factors for this project. Really, the three key components is employment, so job creation, a university on the Placer Ranch site, which I will let Michelle and Vance talk about, and then housing. And then I'll touch on the housing in the Sunset Area Plan. The amendment to the Placer Ranch Specific Plan does include a town center, a university and then housing in addition to that. So

again, job creation, kind of trying to create a job/housing balance within the region.

This is an overview of the work program. The Sunset Area Plan is a policy document. It includes a set of implementing zoning regulations, corridor design standards. There was an existing condition report prepared, economic market analysis as you see here, a number of different documents and text studies that went into the preparation of the plan.

The Placer Ranch Specific Plan has the specific plan documents, design guidelines, development standards. In addition to the tech studies, a utilities master plan, and then at the end, there will be a development agreement prepared for that project.

And then still underway is a capital improvement and finance plan, and then of course the environmental document which analyzes both as you see in the document there. So analyzes the Sunset Area Plan and a problematic level, and then Placer Ranch had a project level with the exception to a Sac State piece, which is really analyzed more in a problematic level, because they intend to come in with some future master planning of that site, at which time it would be subject to CEQA.

So this just shows both plans combining into one map here. So again, this is the Placer Ranch. You can

see it's a lot less specific in terms of the land uses proposed here. This is the university site here, and this is the Sunset, and I will talk a little about those land uses in the Sunset in just a minute here.

In terms of the tasks, our documents completed to date, a lot of work has gone into this project to get to where we are now. But the last time we were before your commission was back in February of 2018 when we had the least preliminary drafts of the two plans, and so we presented that to your commission to seek some input, and since that time, we've really now been preparing this document that's before you today.

We did prepare a couple of different administrative draft EIRs. I will say that we have worked really closely with our key stakeholders, mainly the cities and the agencies, governmental agencies just to make sure that this document was prepared in coordination with them.

I drink a lot of water. Sorry about that. So I'm just now going to talk about the Sunset Area Plan before I turn it over to Michelle to talk about Placer Ranch. So this is really what consists of the Sunset Area Plan as you have before you today. So the area plan is again a policy document, and it covers these different resource chapters that you see there, and then

you have that implementing zoning at the end and some appendices, which is the corridor design standards and guidelines, and then again, the two pending documents are still underway.

So this is the land use map of Sunset. And really, the big changes that you'll see from the existing plan, you know, most of this is all zoned industrial today. We do have industrial remaining here. This is the existing built environment that's largely industrial. Up in here, this is our preserve and mitigation reserve land. There are existing preserved areas there, and then (inaudible). So that was reflective of that, the landscape.

But the two big changes is this area here, which is the entertainment mixed-use district, and then right here is innovation center that you'll see on both sides of this. This actually has a development reserve on it, so any future planning here would be required to go through assistant plan process.

This is our zoning map. I intended to implement that larger land plan, so you can see -- excuse me -- the zone districts are really consistent with the land use designations that I just described.

So real quick, I just want to touch on some notable components. Again, I have presented this before

your commission last year. I'm going to -- I'll touch on them really quick. One is the plan includes an expansion of the Sunset Area Plan boundary that I have shown you before. That was with direction from our board. (Unintelligible) there are 25 acres to the west side as being included in the plan area. We are also proposing an increase in density. This would be for Sunset and Placer Ranch, and it would be from 21 units to 30 dwelling units per acre for high-density residential, general commercial and tourist/resort commercial land uses.

So it would really allow -- so this would be a general plan amendment that would allow the Sunset Area Plan and the Placer Ranch Specific Plan to set their own development standards to go to that density, and that density is consistent with state housing law for Placer County. We are seeing it as a metropolitan area or organization, and so we are required to show density capacity up to 30 dwelling units to per acre.

And then we also have a refinement to a public facility buffer requirement that is in the general plan. So we are proposing a change to that buffer, which I will touch on here in a minute. It would update residential, commercial and recreational uses near the landfill site. So it's really the proximity of those

uses to the property that -- the property boundary of the landfill. And then we also have a level-of-service change -- oops. I'll touch on residential use in just a minute -- but a level-of-service change, which would allow for a level-of-service change of E at major intersections and really focuses on reduction of what we call vehicle miles traveled. And then the two other changes are a residential use allowance in the Sunset Area. Under the existing zoning, residential uses are not allowed in the Sunset Area with exception to the -- there are some areas that are zoned farm right now to have one single-family home on the site there. But our board saw value in trying to provide some opportunity for work-force housing in the Sunset Area, and so there is a provision that would allow residential uses. They would be subject to landfill buffer standards, and they would -- they are all required to have a use permit and required to be subordinate to an employment-generating use on site. So it's really that kind of work-housing balance is what we're trying to achieve there.

And then for the scale and height standards, we have some zoning changes that would allow an increase in height in many of the zones within the Sunset Area and the Placer Ranch Area. This just shows you -- this is a table out of the Sunset Area Plan. I will point out

these buffer standards actually live in our general plan, but we have also included them in the Sunset document. So the change right now under our existing general plan, this -- the solid waste disposal site in Placer for residential is one mile, and so we're proposing to reduce that to 2,000 feet. However, there is a note here that it can be considered on a case-by-case basis to be as close to 1,000 with approval of a specific plan, master plan or development agreement. So for Placer Ranch, the -- there is -- the specific plan is the tool to do that. And then for commercial and recreation, these numbers have not changed here, the 1,000 and 500, but what has changed is that we added a footnote here that those uses within the buffer zones may be considered on a case-by-case basis with approval of, again, a specific plan, master plan or development agreement.

So this just shows those buffers. This exhibit is actually out of the Sunset Area Plan. You can see the 2,000 feet here, 1,000 and 500. I've also overlaid that onto the Placer Ranch site in case you wanted to -- you have any questions about that.

So real quick, I just wanted to touch on Placer Parkway, because it is a key, I would say, component of the plan. This connects State Route 65 at the Whitney

Ranch Parkway to the State Route 70/99, the Sutter County West. I'm going to actually flip to this exhibit, because it's better to look at. So Caltrans and the city of Rocklin have already constructed the Whitney Ranch Parkway, State Route 65 interchange. That's this area over here. Placer County Department of Public Works is proposing to construct that second half of the interchange and the Placer Parkway multi-lane expressway to Foothills Boulevard, so it's seen here in this cross-hatched area.

We have received the NEPA and CEQA clearance for that, for a project level phase one of that. And our Department of Public Works is working on final designs. They do anticipate that to be under construction within two or three years actually. And so the remainder of the parkway would be designed and constructed over time as funding becomes available. I do want to point out that this parkway does serve existing development within the region. It's really what we see as critical infrastructure, provides improved circulation and is really seen as a critical regional stipulation element within West Placer.

So with that, I'm going to turn it over to Michelle and Vance to touch on the Placer Ranch, and then they will hand it back to me to walk through the

environmental document.

MS. KINGSBURY: Good morning, commissioners. Michelle Kingsbury with the county executive office and the other half of Crystal. I am the project manager on the Placer Ranch site. I'll do a brief introduction and then turn the presentation over for the Placer Ranch component to Vance Jones as quick as I can with Stumps Engineering who is our consultant on this project.

So as Crystal mentioned, the board took the unique position in 2016 to insert itself more or less in a developer role to continue the process for the Placer Ranch Specific Plan. And I'll go through kind of a lot of the notable reasons why we did that, and then we'll delve into the actual land plan itself.

So in terms of a lot of these items, Crystal has already mentioned, but I think it's important to reinforce the goals and objectives of the Placer Ranch Specific Plan. The first one being to complement the Sunset efforts and the efforts that have been in place for decades to turn the Sunset Area into a regional employment hub, to provide for a balance of mixed jobs and housing balance in the plan area as well as the other key item is to provide for a site for a satellite campus for Sac State in that area.

We do have a number of acres set aside for open

space preserves, and we are PCCP compliant, i.e., that we are in that yellow area, as all of you are very familiar with on the map, but the area does (unintelligible) for growth. These projects are -- Placer Ranch and Sunset are both wholly within those yellow areas.

We do, as Crystal mentioned, provide for approximately three miles of reservation right-of-way for the Placer Parkway to continue that effort along the northern border of the plan area. There is a number of transit routes, and Vance will get into more detail on a lot of these items. And designation of that would be RTA aligned through to the plan area as well. We've got a regional serving bikeway path network with connection up to existing facilities, as well as providing for connections within into the Sunset Area Plan as well as the adjacent jurisdiction.

It does provide, as Crystal mentioned, for a town center. Juxtaposed next to the planned university site is more a little bit denser, your high-density residential units within that area. It does provide for -- as Crystal mentioned, we are underway, we have a draft and we are currently refining it in terms of a fiscal impact as well as the public facility site (unintelligible) to be financed, trying to provide for a

fiscally responsible plan. There is a number of school sites -- excuse me -- two school sites; one an elementary and one a middle school, in addition to the university site that are designated within the plan area. And last, but not least, parks, open space that are in compliance with our general plan standards of five acres per thousand for each one of those.

Obviously one of the major, if not the major reason the board chose to insert itself in the Placer Ranch Specific Plan processing was the opportunity to provide for a satellite site for the Sacramento State University. It provides for the donation of approximately 300 acres. You'll see in the land plan we'll get to next, it's the light blue color right in the middle of land plan. It's anticipated that the first phase could be anywhere between 500 and 2500 Sac State students and a thousand Sierra College students. It's planned for a Sierra College transfer center on campus where it's almost seamless where students come down, go to Sierra College and Sac State in one location.

Over a 20-year horizon, we expect about 17,000 students broken up into 12,000 through Sac State and 5,000 for Sierra College. But the ultimate buildout that we project would be 30,000 students, broken up

between 25 and 5 between Sac State and Sierra College. However, as Crystal mentioned, it is a propriatic (sic) analysis related to the university site, and they will come back later on with their master planning efforts and tier off the land use document.

This is an exhibit of the land plan, and with this, I'm going to transition over to Vance Jones of McCane and Stumps to provide a more detailed description of the land uses and land plans, and certainly we're available to answer any questions after that. And then Crystal will come back and conclude the presentation.

MR. JONES: Good morning, Mr. Chairman and members of the commission. Michelle put up here for your consideration the land use plan for Placer Ranch. Placer Ranch is actually about 2200 acres of the larger Sunset industrial area, and I'll start by just quickly orienting you to some of the roadways that lead into the plan area. Along the southern area of Placer Ranch is existing limits to the city of Roseville. There are some existing roadways that serve this plan area. A portion of Sunset Boulevard here comes in from the east and connects to Highway 65, and then there is a portion of Foothills Boulevard that extends from the terminus of Sunset Boulevard, extends northwards to Athens Avenue, all within the Sunset Area. And then right through the

middle of the plan area is Fiddyment Road, which is an existing two-lane facility.

All of the balance of the roadways shown here on the land use plan would be improved and/or expanded through the development of the Placer Ranch Area. So that includes the extension of Sunset Boulevard through the plan area. It connects to the city of Roseville to the east. We've actually got a specific plan called the Amoruso Ranch Specific Plan that's been approved within the city of Roseville that Sunset Boulevard would eventually connect to. The same with the new construction of Campus Park Boulevard which would provide an east/west arterial and collect the roadway system within the plan area that parallels Placer Parkway.

And both Crystal and Michelle have mentioned the right-of-way provisions of the Placer Parkway that are included within Placer Ranch is about 158 acres associated with the Placer Parkway right-of-way. That's about a 312-foot right-of-way width with a corridor established by the plan area that allows this parkway to get constructed in the long term as plans and funding come available.

As Michelle mentioned, the obvious component of Placer Ranch is the 300-acre blue site, which is for

Sac State right in the center of the plan area aligned along Fiddyment Road. To the north of that and nestled against Placer Parkway is what we're calling the campus park employment center. That's about 335 acres of non-residential uses. Generates about 4.5 million square feet of non-residential uses at full buildout. And this has a -- and I'll talk to this a little bit more -- a mixed-use approach that would support professional office campuses, research and development, warehousing, light industrial uses and even some limited commercial uses.

And then here just to the south of the campus park employment center and immediately east of the university is what we're calling the town center district, and that's got a mixture of uses of both commercial mixed use as well as higher-density residential uses on about a 200-acre area that are intended to ultimately form a downtown light environment that's purposely cited in proximity to the employment center and the university.

The balance of the plan area, you can see there is a lot of yellow. This is the low-density residential uses. Those are focused primarily to the west of Fiddyment Road. The light green part that we see here is the open-space reserves that are included throughout

the plan area. The light blue parcels are -- this is an elementary school site and a middle school site. The green parts here -- the green parcels are park parcels, the seven neighborhood parks provided throughout the plan area. The couple instances is we've got the larger parks cited adjacent to schools on purpose, so you could maximize some joint use-recreation activities there. And then smaller park spaces cited throughout the residential neighborhoods, so there is always a park space within a close distance to a residential neighborhood.

Most notably there is a pocket of residential here along the southern edge of the plan area which is for an active adult community. Another pocket here along the eastern edge of the plan area for a smaller active adult community, and the parks within those communities would more than likely develop as private recreation centers that serve those active adult communities.

What's important to point out here as well is that this land use plan has evolved a little bit since the commission last saw it last February. Some of the key changes that were made to the plan in response to various comments received last year, as well as working with some of the adjacent jurisdictions. Over here in

this area, the plan -- well, first and foremost, we pulled all of the school and residential uses outside of the 2,000-foot buffer that was established for the landfill facility. So what resulted there was this school site slid southward and now is aligned along Sunset Boulevard. That park grew. Some of the land uses up here were adjusted. There were no longer residential land uses, but instead campus park, commercial and park uses.

Over on the eastern edge of the plan area, Foothills Boulevard was realigned pursuant to discussions with Roseville City staff. The aligning of Foothill Boulevard used to come down like this on the prior plan. It now has been shifted to the east a little bit to utilize the Duluth corridor to the portion of the Sunset Area Plan here. Ultimately, that would connect with the existing northern terminus of Foothills Boulevard located to the south in the city of Roseville.

In addition, we introduced some new residential along the eastern edge of the plan area, that active adult community that I mentioned used to be labeled as campus park. And so we've done overall just some re-balancing of the land uses within the project for a couple of reasons: To make sure that we have a good mix of residential uses, to pull the residential uses

outside of the 2,000-foot buffer, and then also we increased the amount of park acreage to be consistent with general plan policy, because the prior plan had a slight shortfall that was originally intended be met within (unintelligible). This plan stands on its own. It meets general plan requirements of the five acres per thousand.

Moving quickly into the land-use summary, for residential, we've got 5,636 units allocated to the Placer Ranch component of the Sunset Area Plan. About a thousand of those are in an age-restricted, land-use category, and about 1500 of those are in the high-density residential category. Most of those HGR units are focused in the town center district, and that number also includes 300 -- they're called reserve units, but they're really floating units that be could allocated to any parcel within the town center district. So if, as the town center builds out, some of the commercial sites want to introduce a residential component or some of the HGR sites want to have a density bonus or something, that gives the county staff the ability to rent those density bonuses.

For the non-residential component, all in between the university and the campus park and the commercial uses, the plan allocates about 8.4 million

square feet of non-residential units -- excuse me, non-residential square footage, which could equate to upwards of 15,000 new jobs added to this plan area. Those numbers are slightly lower than in the plan that you saw last February. We used to have about 9.5 million square feet. I should point out, too, that the residential unit allocation has dropped as well with the shifts in the land-use plan. That used to be about 5800 units and we dropped about 200 units with the current plan.

In addition to that, we are providing a significant amount of open space and parks to meet the County's general plan requirements. In fact, we're providing more open space than is needed by the general plan. And then also we've noted here a separate line item for the Placer Parkway corridor. That's about 158 acres that is allocated for the future right-of-way for Placer Parkway.

I'll touch on this very, very briefly, because I've hit on it a lot already. Residential units, again, we've got about 5600 units allocated throughout the plan area for residential. We've got several school sites planned; a 10-acre elementary school site, a 22-acre middle school site, and then we've got several other public facility sites that, in aggregate, total about 10

acres for various needs that support the community. We've got a site for a large water storage tank, recycled water storage tank, groundwater wells, other facilities like that that the county will need to maintain a land area like this.

Parks and open space. Again, we've got seven neighborhood parks included in the development plan, nearly 240 acres of open-space preserves, and another 26 acres allocated for paseos. Paseos, for those that aren't familiar with that term, it's very, very similar to a park. Just think of it as a long, linear park. It's developed much like a park, but has more passive recreation opportunities. And within the land plan, those features provide more trail linkages to connect to neighborhoods with schools and other features.

Campus Park, I'll touch on that in a minute. That, again, is a large employment center component of Placer Ranch, and Michelle already touched on the 301-acre site that's allocated for Sac State's university and center plan area.

Crystal touched on the general plan amendments that are associated with Placer Ranch. Again, the increase in the density for HGR is received by Placer Ranch, particularly in the town center district, where we expect the highest-density residential land uses to

occur. And then also the height limits for buildings, particularly in the campus park district, the general plan would be amended to allow those building to become higher than the current zoning will allow.

Crystal touched on the 2,000-foot buffer from the landfill. Like I said, we did revise the land-use plan to pull all of the residential and school uses outside of that 2,000-foot buffer. And even though we have a specific plan in the development agreement that could allow those uses to get as close as 1,000 feet, we just felt that it was better planning to keep everything outside the 2,000-foot level. So we're not seeking any special -- any special considerations up 1,000 feet with the current plans before you.

This slide here highlights the campus park district. Again, that's about 335 acres located on the northern edge of the Placer Ranch Plan Area, aligned along Placer Parkway purposely so it has good visibility from this future regional-serving roadway. Again, it's about 4.5 million square feet of non-residential uses could ultimately develop here. Community employment overall, like I mentioned before, about 15,000 jobs could be created through the implementation of buildout of Placer Ranch.

And then I'll touch briefly on the town center

district here. Really, the notion here is you've got about a 200-acre area that's adjacent to the university and the campus park employment center -- excuse me -- campus park employment center is immediately to the north, and the university is immediately to the west of this district. Really, it's the area north of Sunset Boulevard, kind of sandwiched in between Sunset, the campus park employment center and the university where the highest intensity and density of uses are planned.

Adjacent to the university, the commercial mixed-use parcels there are intended to develop like a small downtown setting, with commercial buildings, maybe mixed with residential that feel like a small downtown. That would be linked with the main street through a high-density residential area to some more commercial mixed-use parcels that are aligned along the Foothills Boulevard corridor. Really, the thinking there is, is that on the west edge of this district is the downtown environment. On the east edge of this district is where you would have more traditional, suburban neighborhood-serving shopping center, like a grocery store anchor. But the whole district is anchored by the central village green that could be programmed by county parks for farmers markets or concerts in the park once this area develops. And all of that is surrounded by

higher intensity and density residential uses.

This slide really hits on the bikeway network plan with Placer Ranch. If you focus on the green dashed lines here, that's the class one, street-separated bikeway system that's located either in the parks, open space corridors and the paseo linkages that I mentioned. And that's a ten-foot wide pathway with a four-foot decomposed shoulder for joggers and walkers that thread through all the open-space areas and link up to various residential neighborhoods, to the schools and parks and university.

In addition to that, there is -- what the pink line work on this exhibit shows are all the trails that are located in the landscaped corridors adjacent to roadways. So in total, between those two systems, you've got about 22 miles of street-separated pathways that are provided in the plan area.

And then in addition to that, the light blue dashed line would represent the on-street, Class II bike lanes that are geared more for the bicycle commuters. And those are provided on all major backbone roads, including arterials and collective streets.

This slide highlights all of the open-space parks and school sites in the plan area. I've hit on those briefly, but again, we've got an elementary school

site on the far west of the plan, a middle school site there, the university site and it's central to the plan area. All of the open-space preserves are shown here as well in light green. You can see through the university site, there is actually going to be some open-space preserves that will happen as the university develops, too. So that's part of a larger, interconnected system here. And then as well as the neighborhood parks are illustrated on this diagram.

Major roadways, as I mentioned before, there are several existing roads within the plan area, and those are shown in dark blue; the connection of Sunset Boulevard out to Highway 65 and the extension of Foothills Boulevard north into the Sunset Area, as well as Fiddyment Road through the middle of the plan area. The dashed gray line shows the future route for Placer Parkway that's being planned for. And then the lighter blue lines are just some of the other major backbone roadways planned within the plan area.

Within the core of the plan area, these are all our arterial roadways, and then as you move further west, because of the residential nature of the plan area, those actually transition to collective streets.

Transit. Transit is something that the plan has put a lot of forethought into. It's hard to really see

this at this level, but all of the roadways within Placer Ranch have been designed to accommodate future local bus service. So on the downstream side of every major intersection in here, the bus turnouts have already been predesigned, so there is space for busses to be accommodated in the future as transit is implemented here.

In addition to that, we've noted a conceptual route for bus rapid transit, and that's shown in the pink dashed line. And this route is by no way finalized by PCTPA. This is a long-term vision for how BRT can be accommodated within Placer Ranch, but the notion here is that the portion of Placer Parkway is used for that BRT route, and ideally, that route would come off-line of Placer Parkway and come within the project where it provides adjacency to the university, the employment center and campus park, as well as the town center before it links to neighboring jurisdictions in Roseville.

In addition to that, the transit master plan will be prepared by the county in the future. And that will guide implementation of transit through this area as Placer Ranch builds out.

I'll touch briefly on utilities, because there are some critical infrastructure components here

associated with Placer Ranch. First and foremost is working with PCWA on a 42-inch regional-serving water line that connects to their treatment facility up in Ophir and it comes all the way down to West Placer. And that's shown here in this dark blue line, and really, the Placer Parkway corridor is where that line will originate. But that 42-inch water line comes into Placer Ranch via Campus Park Boulevard. It will connect to a future 5.1 million gallon water storage tank that serves the region before it exits the plan area and continues west.

In addition to that, there are several inter-ties to Placer Parkway system here along Placer Parkway corridor as well as existing facilities that are located in Sunset Boulevard and Nichols. And then also inter-ties are shown along the southern and the western edge of the plan area where Placer Ranch's backbone water system can tie into the systems located in the city of Roseville. And the purpose of that is to provide a redundant, reliable supply of water both for the county as well as for the city.

Recycled water is shown here. It's probably a little bit too much detail to go into at this level, but the nuts and bolts of it are that at the southern edge of the plan area where Woodcreek Oaks Boulevard comes

into Placer Ranch from the city of Roseville, Placer Ranch can tie into existing infrastructure there to provide recycled water for Placer Ranch and the Sunset Area. And that pipeline would be extended into the plan area to a storage tank and pumping facility, which then feed lines throughout the plan area that would provide irrigation water for all non-residential parcels as well as roadway medians and landscape corridors and parks.

And then finally, the backbone wastewater infrastructure system here is shown. There is a regional-serving facility located in West Roseville, the Pleasant Grove Wastewater Treatment Plant. This project would be served by that plant, and there are a couple of tie-in points where offsite infrastructure would be constructed to tie into the regional line to that facility; one down here where Foothills Boulevard exits the plan area, and one here where Fiddyment Road exits the plan area. Those lines would be extended from existing lines located in the city of Roseville, and those are offsite improvements.

All right. Well, that's my portion of the presentation. Turn it back over to Crystal to wrap it up.

MS. JACOBSON: Thank you, Michelle and Vance. Before we move into talking about the impacts that were

identified in the draft environmental document, we just wanted to ask if there were any questions on the Sunset Area Plan or the Placer Ranch Specific Plan. I think this is the time where we could answer questions anyway.

CHAIRMAN MOSS: Questions?

COMMISSIONER HAGUE: Yeah. Why are we leading in the ability to push residential to a thousand feet within the facilities since they're not really planned to be that close? It just opens up that some day, somebody may want to come in and do a land-use change to be closer, and if so, what are the things you're looking for in the use permit which would allow us to be closer to that landfill?

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MS. JACOBSON: Well, we have made refinements to the Placer Ranch project in response to comments that we've received. And at this juncture, we have not made those same refinements to the plan in terms of pulling it out to 2,000. It's definitely something that we have talked about. We do know that there is some interest with surrounding properties around the landfill that may come in with specific plans in the future and may want to place work-force housing as close as a thousand. So that was our goal right now is to leave it in at 1,000 with approval of a specific plan, master plan or a development agreement.

However, I would just point out that the plan itself, both plans can be modified and evolve all the way up until adoption. So there is potential based on comments that we will continue to receive that we would make modifications there.

In terms of things that we are looking for with a use permit would be -- would have to do with, like, site design or even the uses that would be proposed. So for example, we might not want to place daycare facilities with outdoor playgrounds, those kinds of things near as close as 1,000 feet. We would also be looking for building designs, HVAC systems that would help. Commercial uses, trying to maintain uses in that area that would be indoor commercial and not necessarily outdoor commercial. To some extent, I think the market will drive that. But there -- we do have actually a mitigation, and I don't have that number offhand, but there is some mitigation in the land-use chapter of the document that speaks to what those types of site and building design features would be that we would be looking for.

COMMISSIONER HAGUE: Okay. Another question. Looking at the transit piece you have, what about future alternatives transit modes, such as driverless cars or pods, are they being considered in this transit plan?

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And is there any kind of transfer station to get people if you get it one location and then move out to other locations?

MS. JACOBSON: Well, so I will speak to the Sunset Area Plan. There are a lot of policies that point to that, those types of new trends that would come on-line. So we really did try to create policy in the Sunset Area Plan that is reflective of the fact that there could be changing trends when it comes to transit. With respect to the transit master plan, that was not prepared. That is something that will come in in the future, and we would looking for the Sunset Area Plan policies when we develop that.

I don't know. Michelle, do you or Vance want to speak a little bit more to the transit master plan for the Placer Ranch piece? But definitely, those types of -- those types of new trends in transit would be considered.

MS. KINGSBURY: Just adding on to what Crystal said, as she mentioned, we'd be, just pretty typical, process requiring a transit master plan to be prepared, which would fine-tune it and delve into those details and look at the policies in the area plan as well and to cost it out. We've also had discussions with the university about that interaction between the two and

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providing for the kind of transfer center over there as well. But we fine-tune that through the master plan.

COMMISSIONER HAGUE: Okay.

CHAIRMAN MOSS: Any other questions? No.

I have one, maybe just one. I don't know. We'll see where it goes. The current Sunset Industrial Plan has a considerable amount of property that is zoned straight industrial; correct?

MS. JACOBSON: Correct. Uh-huh.

CHAIRMAN MOSS: The proposed plan does not have any straight industrial proposed zoning. It goes down to light industrial. Is that --

MS. JACOBSON: It's light industrial and industrial mixed use, but we were very careful to carry forward all of the existing uses. It's really a re-branding of the title or the name of those zone districts. But the intent is to recognize the existing industrial uses on those sites and really to carry forward those types of uses in the industrial area.

CHAIRMAN MOSS: So I guess my -- like I said, there's the area in there that is being serviced by railroad and by (unintelligible) for industrial uses, and would pay to see that those be precluded for being used for what they are ideally suited for, especially with the limited amount of railroad-access property that

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there is best suitable for those type of uses.

MS. JACOBSON: We agree. And that is exactly why we're carrying forward those uses because of that proximity to rail.

CHAIRMAN MOSS: And I mean not -- you're carrying forward the actual uses and not users?

MS. JACOBSON: Allows users and allows uses, yes.

CHAIRMAN MOSS: Okay. I think that takes care of my questions. Thank you.

MS. JACOBSON: Uh-huh. Any other questions on the plan before we dive into --

CHAIRMAN MOSS: And maybe -- let me stop and take a quick check with our reporter. Are you holding out all right or do we need to take a break for you now before we dive into something new?

THE REPORTER: I'm fine.

CHAIRMAN MOSS: All RIGHT.

THE REPORTER: I just need you to slow down a little bit.

MS. JACOBSON: I'm sorry.

THE REPORTER: Please.

MS. JACOBSON: Okay. I'll try. So I first want to at least -- this line and the next line are just a list of the proposed entitlements. You will find the

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project description of the EIR. They really illustrate the actions that our board will be asked to take and your commission will be asked to make recommendation to the board. So these have been analyzed. There are a lot of them. They have been analyzed in the EIR. I do want to point out this -- you know, we're talking about planning an area of approximately 8500 acres. So with two big projects, so a lot of actions would be asked for the board's consideration at the end.

So for the notice of preparation, again, this process, the environmental process started way back in 2016. They end there. The notice of preparation was circulated from November 3rd to December 12th in 2016. We did hold two public scoping meetings at that time. No additional study was prepared with ALP as we assumed and knew that there would be attacks that would be significant and potentially significant, so we just analyzed the full (unintelligible) on-site.

These are -- this is a list -- actually, before I get to that, I just want to talk to -- about kind of the timeline of the environmental document. So after the scoping meetings, we did prepare the technical study that I had talked about, a lot of coordination with our neighboring jurisdictions on preparation of those studies. And again, we prepared two different

administrative draft EIR's, and also worked with the first one, coordinated with those agencies on preparation of the first one.

And then, again, the preliminary public review draft of the plans came out last year. The idea was to get some input and make some changes. We actually did make a lot of changes to transit policy in the Sunset Area Plan, and then, as Vance had noted, we made some modifications or refinements to the Placer Ranch Specific Plan, too, in response to those comments. And then finally, we released the draft document this December.

So this list here outlines the areas of controversy that were noted in the ALP. So the EIR does focus on these. I'm sure I am not going to list -- to read all these. But really, the environmental impact tips on all of these areas. It's a long list.

And then this is just a list of the impact analysis. Again, I want to point out a couple of things, the sort of organization of the EIR. We analyzed the Sunset Area Plan plan as (unintelligible), Placer Ranch at a project level, real specific, because as Vance highlighted, it gets down into (unintelligible) project being proposed to (unintelligible) the specifics, with the exception to that Sac State site.

The intent there is that they would tier off of this document for their own master planning.

And then I wanted to point out that there are a lot of offsite improvements associated with this project that are actually outside of the County's jurisdiction. So a lot of them are located in the city of Roseville or they would fall under the jurisdiction of, for example, the Placer PCCPA with the parkway improvement, that kind of thing. So for those, what we have done is we have identified them as other supporting infrastructure. So if you did read the EIR, you will find that in each resource section, we would break down the impact and the conclusions for what we call other supporting infrastructure. And so that could be what you would find in the document as there is a lot of discussion about the Pleasant Grove retention facility. This is a facility located in the city of Roseville boundary, and again, it's offsite and not within the Placer County's boundary.

So that's really how the document is organized. So really quick, I'm not going to touch base too much on the no impact or less-than-significant impact. So this was for the Sunset Area Plan and the Placer Ranch Specific Plan, not the offsite, other supporting infrastructure like I just mentioned. So they're listed

here, but there are impacts associated with these resource chapters that were found to be either have no impact or less-than-significant impact of mitigation.

Same thing for the other supporting infrastructures. So I'm not going to get into those, but what I am going to touch on are the significant and unavoidables. And I just want to point out that, again, large -- you know, about 8500 acres is what we had analyzed. And so there, you probably found that there were a lot of significant and unavoidables. However, I want to provide a little clarity about them. We have -- I sort of broke them out into three different categories. One, there are impacts that can be mitigated that are outside the County's jurisdiction. So for those offsite improvement projects, there were a lot of significant and unavoidable impacts that actually can be mitigated to the less-than-significant level. But because they're outside of the County's jurisdiction, we do not have control over the implementation or timing of those mitigation. So they have been deemed significant and unavoidable. And so I'm going to -- I'll talk about what those are, and then I'll dive into the significant and unavoidables that are for the Sunset Area Plan/Placer Ranch, and then I'll talk about the cumulative impacts.

So for the significant and unavoidable, these are impacts that can be mitigated to less-than-significant mitigation, but again, they're outside of our control, because they are located offsite and outside of the Placer County boundary, are related to aesthetics, biology, archeological and historical and tribal cultural resources, geology and soils, hazards, hydrology and water quality, transportation, circulation and utilities.

So I'm not going to dive into each of these, but I will touch on a couple of them. So a lot of these impacts here in the bio are related to impacts that are associated with the Pleasant Grove retention facility, which is located to the west of the project site in the city of Roseville. All of them except for impact 4.4-8 is related to that site, and I want to point out that there is mitigation, standard mitigation practice that the county would implement ourselves, if it was within the county, that would mitigate these impacts to less than significant. Again, we drew a conclusion, a very conservative -- we took a conservative approach, and we do this with all of our projects, so you've probably heard this before, where if the impact and mitigation is outside of the County's authority to implement, then we call it significant and unavoidable. So that is what

you see there.

Impact 4.4-8, I did want to talk a little bit about. This is interference with -- substantially with wildlife movement. So this has to do with wildlife crossing really over the Placer Parkway. So we've got, you know, a very large circulation system going through the area, the planned area. And so we looked at wildlife movement throughout the plan area and found that there was an impact there. We do have mitigation that would minimize this to less than significant with maintenance of interconnected natural areas that would really protect biodiversity and sustain our eco system in this plan area; however, that mitigation would involve coordination with the Placer County Transportation Planning Agency, since they do have jurisdiction over that parkway. And then the feasibility of incorporating those movement features into the design is (unintelligible), so this impact has been considered significant and unavoidable.

And then touching on the aesthetics here, the same thing -- all of these that you see listed here, again, there are very standard mitigation that is available that the County would utilize and implement if it was within the County's jurisdiction, but it's not. And so we have deemed these significant and unavoidable.

And I'm not going to -- for the sake of time, I'm not going to touch on those in detail.

And then we get to hazards, hydrology and water quality and utilities, and I do want to touch on a couple of these. In the hazards section, especially if it's hazardous materials during construction, interference with implementing the emergency response plan and vector-related health hazards, again very, very standard mitigation is available for those. Those would not have been deemed significant and unavoidable if they were in the County's jurisdiction.

For hydrology and water quality, I did want to touch on the two 4.9-3 and 4.9-4, same thing; very, very standard mitigation that you would see the County implement if it was in our jurisdiction. But 4.9-1 has to do with stormwater runoff, and I kind of want to talk a little bit about that. So the analysis includes option for -- two options for mitigation of stormwater runoff. And I'll point out that in this plan area, we have a water shed break through the middle of the Sunset planning area. The waters to the north would flow into the Auburn Ravine and Orchard Creek water sheds, and the waters to the south would flow onto the Pleasant Grove Creek water shed. So for Placer Ranch, all of Placer Ranch would flow into Pleasant Grove. We have had a lot

of coordination, a lot of meetings with the city of Roseville about potentially utilizing that facility when it comes on-line for mitigating impacts for the water shed to the south, so all those flows that would run into the Pleasant Grove Creek.

However, that facility, it has been approved. It's a -- has gone through, like, a programmatic level environmental analysis, but has not been constructed and it has not gone through any project-level CEQA analysis to date. But we have been engaged with them. The intent is that the flows from Placer Ranch, so we do that project-level analysis to show that that facility that was expanded and that was analyzed in our document, that that facility can handle the flows from the Placer Ranch project and the Sunset, the southern portion of the Sunset.

However, I'll point out that what we did is provided for two different options in the mitigation. One is to either -- like in the north, it would go to the Lakeview -- what we call the Lakeview Farms, which is in Lincoln. That site actually is under design and construction to accept stormwater flows. And then in the Placer Ranch and the southern portion of Sunset, it would be to the Pleasant Grove site or retention on-site. And so currently, what we do out there is

actually retention on-site. So if somebody comes in in the Sunset Area, we do require them to retain their stormwater flows on-site today. So there is mitigation set up to be an either/or. So when those facilities came on-line or our project came in in the Sunset Area, for example, that's in the north, we would require them to mitigate or retain on-site or to work with the Lakeview Farms facility.

So the reason this is deemed significant and unavoidable is because those two facilities, again, are outside of our jurisdiction. So while we have identified them as areas to mitigate stormwater flows, it's really out of our control in terms of securing agreements to do that.

And then -- let's see. So for the utilities, I also wanted to touch on the utilities. Here is an impact 4.15-2. This has to do with increased demand for water supply conveyance and water treatment services. I just want to point out this is not necessarily about water supply, but really the conveyance. And so the existing -- there is a -- PCWA has an existing Foothill Water Treatment Plant and Sunset Water Treatment Plant that don't -- that do not have sufficient capacity to accommodate water treatment needs for buildout of the Sunset Area and the Placer Ranch existing plan.

However, there is anticipated construction of the Ophir Water Treatment Plant that would have that capacity. It just -- it is not under construction to date. It is planned with PCWA and would certainly accommodate it. It's just not on-line to date. And so this has also been deemed significant and unavoidable, because again, the construction of that facility is outside of the County of Placer jurisdiction.

And then for traffic element, there is a number of impacts here. The same thing. They are impacts to areas outside of our jurisdiction. Where mitigation is available, I am going to kind of touch on these. The first is an impact to signalize intersection operations in the city of Roseville. This would increase -- the studies show that would increase delay and degradation for the level of service. The draft environmental document does identify mitigation that would require projects to pay traffic impact fees for their fair share of the contributions to fund improvements to those intersections; however, again, while mitigation is there and it's likely that the city of Roseville will implement that mitigation, it is outside of our control, and so it's been deemed significant and unavoidable.

Same thing with the -- the next one is the unsignalized intersection operations with the city of

Roseville. This is the same. There was an impact found here. There is a mitigation again identified to pay traffic fees to fund fair share contributions, but again, because these improvements would require approval and implementation by the city of Roseville, they're not within our jurisdiction.

And then you'll see the same thing here with the city of Rocklin. The impact associated here results in degradation to level of service and increases delay at intersections that are already operating at an unacceptable level, so it's deemed significant. Again, the mitigation here is the same. Paying traffic fees towards fair share contribution to fund improvements that would reduce these impacts. Again, outside of our jurisdiction.

The city of Lincoln is a little bit different. The impact to city of Lincoln is really significant and unavoidable in the short term, because the phase one of Placer Parkway would actually help with this impact. So it's considered significant in the short term until that phase one of Placer Parkway came on-line. But again, any improvements would be outside of the County's jurisdiction.

And then for Sutter County, the same thing here. I want to point out that the improvements here, there

are -- there is mitigation monies that have already been accepted from other developments in the region, and improvements would be needed to Baseline Road and Pleasant Grove Road north and Baseline Road to Pleasant Grove Road south. And so this would be actually -- the improvements are funded by traffic fees that have already been provided by future development within the Dry Creek Benefit District of Placer County in the CIT. So those would mitigate impacts in that area, but again, it's outside of our control in terms of the implementation and timing of those improvements.

And then for Caltrans, here you'll see an impact for 14-9. This would be an impact to the intersections under the Caltrans jurisdiction. And the same thing, we do have mitigation that's been identified in the draft that you'll see for payment of traffic impact fees for fair share contribution that would go towards improvements of highway ramp terminal intersections, but there again, it's -- we cannot ensure implementation of that, of those improvements.

And that would be -- those intersections would actually be -- it could be implemented definitely by Caltrans, but also the city of Roseville or the city of Rocklin would be involved in that, too.

And then you have impact of freeway operations

that you'll see here at the bottom, 4.14-10, and this has to do with the freeway operations on 80 and 65. I'll point out that phases 1-E through 1-C of the Interstate 80/State Route 65 interchange improvements and the phase one and phase two of State Route 65 widening project would help to mitigate this impact. And the South Placer Regional Transportation Authority fee program would address some of those; however, full funding those improvements is not available. So because we do have mitigation, again, that would require a fair share contribution towards mitigation or towards this impact; however, because there is only really partial funding that has been identified for these improvements, again, the State Route 65 widening project and the Interstate 80/65 interchange improvement, this has been deemed significant and unavoidable. And again, it's -- the authority for us to implement this is outside of our control.

So what I'm going to do now is turn to the significant and unavoidable impacts that are associated with the Sunset Area Plan and Placer Ranch, and in some cases, the other supporting infrastructure as well. And that's a list of the resource tractors (sic) that I'm going to touch on. So the first is the aesthetics. Again, what I want to point out is that under CEQA, we

do analyze the project based on what we call baseline. That's existing conditions. So while a lot of this land back here is zoned for industrial and has existing development capacity, a lot of it is undeveloped land. And so when I touch on these two impacts, I just want to point out that we think about it in that context; that we're talking about land that is currently undeveloped, we do not have existing development capacity.

So for aesthetics, we found that there was an impact to substantial degradation of the existing visual character or quality of the site and its surrounding after buildout. So within the Sunset and the Placer Ranch, we found that there would be a change in the visual character that would be substantial in areas that are currently undeveloped, and where needed, substantially taller development would be proposed and allowed with improvements of these plans. So in views where project development would be placed adjacent to preserves and open space, we also found some impacts there. So we've got all those natural preserves to the north of Sunset, and so it's that abrupt transition between substantially taller developments and those existing open spaces, there would be an impact. So the impact is significant and unavoidable.

I have to point that we do have design

guidelines prepared for Sunset and Placer Ranch that would certainly facilitate a cohesive outside appearance to that development in landscaping throughout the project area. However, there are no additional feasible mitigation measures that would reduce this impact to a less-than-significant level.

And then for -- we also have this impact 4.1-4 as it related to light and glare. So the impact is a new source of substantial light or glare that would adversely affect day or nighttime views in the area after buildout. We do have general plan policies, Sunset Area Plan policies and Placer Ranch policies and design guidelines that would emphasize the use of less-reflective surfaces and orientation of the buildings as well as other lighting requirements to try to limit these impacts. However, it's really the quality -- excuse me, not quality -- the substantial source of the light across the entire project area that is the impact here. So there is really no feasible mitigation beyond those policies and those guidelines to lessen this impact.

The next one is related to ag resources. And this has to do -- it's impact 4.2-1. This is a conversion of farmland to a non-agricultural use. This applies to the Sunset Area, Placer Ranch and the other

supporting infrastructure, mainly that Pleasant Grove retention facility. So the DEIR found that implementation of the project would require conversion of farmland. We have planting farmland, farmland with statewide or local importance and unique farmland designations by the state. So it would convert it to a non-agricultural use. Again, even though some of those areas may have existing development rights, we're talking about land that is designated by the state as farmland.

So with resulting conversion of up to 7,295 acres of farmlands altogether, and although we do have mitigation that would require a project to mitigate for that loss on a one-to-one ratio, it would really only partially offset the direct conversion of farmland. And so this has been found to be significant and unavoidable.

Moving onto air quality, there are a few impacts here. The first is construction emissions of criteria air pollutants and ozone precursors. And so the DEIR found that construction emissions associated with the project, again to be the Sunset Area Plan, the Placer Ranch and the offsite, it would exceed applicable thresholds, and thus contribute to the existing non-attainment status of the Sacramento Valley Air Basin

with respect to these emissions. And so for that, we do have mitigation that is identified in the EIR, point that out in your staff report there, that would require implementation of PCAPCD's, the air district recommended construction mitigation measures to include the dust control plans and things like that. However, because of this scale and expense of this project and really the timing of this buildout over a number of years, this impact was found significant and unavoidable.

The next is the long-term operational emissions of criteria air pollutants and ozone precursors. This found that operations of the project after full buildout would generate emissions, which are precursors to ozone and would exceed the applicable amount of emission thresholds recommended by the air district. So the long-term emissions produced by this project would conflict with their air quality planning efforts and contribute substantially to the non-attainment status of the air basin. So this is significant.

Again, we do have a lot of mitigation identified for this, which would require future development projects to demonstrate reduction of area source emissions, mobile source emissions, (unintelligible) emissions as well as purchasing offset through the air district's offsite mitigation fee program. And while

that mitigation would reduce these impacts, it cannot be reduced -- it has found that it cannot reduced to less than significant.

And then the next impact 4.3-5 has to do with sensitive receptors to toxic air contaminants. This applies to both Sunset and Placer Ranch, not the offsite infrastructure. And this found that the development of new residential land uses or other sensitive receptors within 500 feet of State Route 65, which is considered a high-volume roadway, traffic volumes that exceed 100,000 trips per day, which is a setback distance recommended by the California Air Resources Board. And then also development of land uses that would be -- excuse me -- some of the land uses under the project are trucks loading near residences, schools or child daycares could result in exposure of these sensitive receptors to contaminants. So we do have mitigation that requires incorporation of site and building design features for future development to reduce this impact; however, this impact was found to not -- was not reduced to less-than-significant levels.

And then -- oops, I'm sorry. I missed one here. The one at the bottom here, impact 4.3-6, create objectionable odors affecting a substantial number of people. This applies to the Sunset and Placer Ranch and

has to do with the change in the buffer policy. And really, it has to do with increased odors at the landfill that are a result of waste generated from this project. So that's specifically what the analysis is doing here, is demonstrating. So the project would generate waste that would be received, processed and disposed of at the Placer County Western Regional Sanitary Landfill, thereby contributing to sources of the landfill odor over time. I'll lose my voice here. As odor generation is generally proportionate to the volume of the waste generated and processed, the DEIR found that the project would, at its peak, represent about 16 percent of the odor currently generated at the landfill site. And at the time that the landfill closes in 2058, it would represent approximately 8 percent of the odor emissions. So it goes down over time. And I do have a specialist here to answer questions if you have any about the odor. It's actually my first dive into odor analysis, but we do have somebody here if you have questions about this.

So while the project would not necessarily -- it doesn't create objectionable odors, it would establish residential and other land uses and bring people closer to the odor source, that's the landfill. And that's as a result of that change in the buffer. So based on some

existing data that you'll see in the DEIR, namely, there is an exhibit, it's 4.3-1 that shows the location of existing complaint -- odor complaints that the landfill gets on an annual basis. Based on that data, we found that residents beyond one mile are being impacted to date, and there is also some modeling and analysis of post-project landfill odor. So we found that new residents in the Sunset and Placer Ranch Area would be exposed to objectionable odors and may complain about those odors. So the overall number of complaints lodged about odors would potentially increase.

As you'll note in our environmental document, the Western Placer Waste Management Authority is engaged with the community. They continually engage with the community on odor management. They are also assessing the viability of odor-reducing approaches through pilot studies. They have pilot studies going on. And they are actively planning a facility and operational improvements as part of what they call a Renewable Placer Waste Action Plan, and the plan is to address growth regulatory requirements and other goals and objectives, including odor controls as a piece of that. However, I want to point out that these measures, again, are beyond the control of Placer County. Annually, the nature, degree and effectiveness of these odor-control

measures are unknown at this time. Their planning is still underway. So this is then significant and unavoidable.

Okay. Moving onto biological resources. These two here that you see, I just want to point out that with implementation, they are identified as significant and unavoidable. We have two different approaches for mitigation where they can approach through the Placer County Conservation Plan if it were -- when and if it's approved. And if it was approved, these two mitigations that you see -- or excuse me -- these two impacts that you see here could be mitigated to less than significant because of the Placer County Conservation Stratus approach of large-managed reserve systems that would really protect and conserve land rather than a project by project kind of fragmented and isolated approach to mitigation.

So you will see impacts here associated with the Sunset and Placer Ranch and other supporting infrastructure related to the loss and degradation of state or federally protected waters as well as vernal pool and western spadefoot habitat. But again, I'll just point out that they are deemed significant and unavoidable. The intent, though, is for projects to mitigate through the Placer County Conservation Plan.

And then for greenhouse gas emissions, I want to touch on that. There is an impact associated with operational greenhouse gas emissions. It applies to just the Sunset Area Plan and the Placer Ranch, not the offsite infrastructure. So operation of land uses developed under these plans estimate it should generate about 380,000 metric tons of carbon dioxide implements at buildout. That's for the Sunset. I'm sorry. Excuse me. For Placer Ranch, it would be about 200,000. These levels exceed the air district threshold and have a potential to result in considerable contribution to emissions and climate change and would conflict with state greenhouse gas-reduction targets that have been set.

So we do have mitigation identified for this impact, which would require all feasible site and building design features for new development which could offset a single year of operation-related greenhouse gas emissions and reduce those impacts related to operational greenhouse gas emissions; however, that mitigation alone would not reduce the emissions for the life of the project below those thresholds.

Okay. Moving on to land use, there is an impact related to consistency and compatibility to the Western Regional Landfill. So this is really a land use and

compatibility impact, similar to the one I just described about air quality, except this is really about, again, compatibility of all residential uses up next to a landfill site. So again, the project has proposed a reduction of that buffer, and which would result in putting residential uses closer to the facility than would otherwise be today under the current general plan. And again, based upon that data, we found that it's quite possible that odor complaints would rise. And because of that, it could create pressure on the Western Placer Waste Management Authority to implement additional odor control reduction measures at that site. And that absent those odor sources, it could interfere with the ability of the landfill to expand or modify their operation. So we have identified some mitigation, again, this is the one I talked about earlier about site and building design that we would require when projects came in through a specific plan and master plan or development agreement.

However, we did find that it could not be mitigated to less than significant. So while that mitigation would not eliminate, it doesn't eliminate the source of that odor or any of the factors that contribute to the identification of range or perception of odor. So the wind, temperature, that kind of thing;

we can't control that. So this has been found to be significant and unavoidable.

Where are we at? So the next has to do with noise, and the first is exposure to existing sensitive receptors to construction noise --

CHAIRMAN MOSS: I'm sorry. I'm just worried about our reporter here. Maybe if we -- do you think if we could, would this be an appropriate time to take a few minutes here and let her do this and -- how much more -- where --

MS. JACOBSON: I am just about done with the significant and unavoidables before I go into the cumulative impact. So there is more to come, but --

CHAIRMAN MOSS: So maybe if we could, let's --

MS. JACOBSON: Want me to get through these? I have, like, three left and then take a break? Would that be --

CHAIRMAN MOSS: I mean, we're past kind of the hour and a half threshold I was given. If you don't mind --

MS. JACOBSON: Okay.

CHAIRMAN MOSS: -- and the commissioners don't mind, we'll take a break here and let you do this, and be back at 10 till or something like that.

MS. JACOBSON: Great. Thank you.

(Recess.)

CHAIRMAN MOSS: Please be seated. We'll try and wrestle once again and we'll let you get wrapped up here.

MS. JACOBSON: Okay. I'm going to -- I know it's taken a long time. I'm sorry. There is a lot of material. But out of respect of folks' time, all this information, I will point out is in the staff report. So what I'm going to do is just read the impact statement, and just -- we have a couple more to cover here, same with cumulative, and then I'll touch on alternatives, because I think that is important to speak to and then I'll close.

CHAIRMAN MOSS: Thank you.

MS. JACOBSON: So again, these two impacts are to the land use that I just spoke about previously, and then two related to noise that have been deemed significant and unavoidable exposures, existing sensitive receptors to construction noises, and then exposing new and existing sensitive receptors to project-generated transportation noise. Again, going from an undeveloped site to a development, you get that transportation impact.

And then two; one related to population employment and housing, just putting, you know, new

growth in the area, and then one related to transportation circulation, the vehicle-miles-traveled impact.

Cumulative impacts, there are two to aesthetics. I'm not going to touch on these, because they are really the same as the ones I touched on earlier in the significant and unavoidable. Air quality is the same as I had touched on earlier, and they are also deemed cumulative. And then you get into bio. The same thing here, except I will point out, as I mentioned earlier, with approval or adoption of the Placer County Conservation Plan, these impacts can be reduced to less than significant. But they are considered cumulative in this document.

And then down here, same thing with the archeological, historical and tribal. There was an impact found there. Noise. The two noise impacts that I just talked about, again, those are considered cumulative. Population, employment and housing; again, new growth in the area. And then a number of transportation and circulation impacts, and again, those are related to the impacts that I described within the neighboring jurisdictions.

Okay. So that brings me to the alternatives. I'm going to touch on those. There are five

alternatives talked about in the document. Alternative one is a no project. So that would be just that, no project. So assume the project is not approved and development would occur consistent with the 1997 adopted plan.

Alternative two is what we call the reduced scale. This is in response to significant impacts associated with aesthetics. And it's that transition to taller buildings and an undeveloped area like I talked about earlier. So this would result -- would reduce overall scale of development by reducing the allowed maximum building height. The alternative would also help to transition between developed areas and undeveloped preserve areas. And then under this alternative, the Sac State Placer Center would not change.

For alternative three, this is what we call a reduced footprint, reduced development potential. And so -- yes, three. Sorry. So for three, this is in response to impacts related to the vernal pool recovery core area. So again, what you would be doing here with this alternative is to try to avoid those areas. So the project would, again, result in preservation of about, under this alternative, 29 percent or 2,140 square feet of the core area of the vernal pool habitat. This

alternative is designed to address the significant project impact by increasing the amount of core area preserved to 3,600 acres. This alternative would reduce the area subject to development as compared to the project and reduce the overall development potential of the project. It also addresses some other impacts associated with this project, including traffic, the VMT, greenhouse-gas emission, air quality and noise. And then under this alternative, the Sac State Placer Center would not change.

Alternative four is similar. It's a reduced footprint, similar development potential. So it's much like alternative three. It would achieve a smaller reduction in the project-related impact to the core vernal pool habitat. It would maintain a similar development pattern to what is proposed, and it has almost 1,500 fewer developable acres. It results in a more compact development with a shift from lower-density residential to higher-density residential. So that's how you would achieve this. And then non-residential structures would be slightly taller and may include parking structures. And then under this, again, the Sac State Placer Center would not change.

Alternative five is in response to impacts related to VMT. So in VMT, one of the larger sort of

components of the impact had to do with the entertainment mixed-use area and its draw for -- it's a -- it's considered a regional draw. Also, there is a lot of VMT associated with that land use. So under this alternative, it would aim to achieve a reduction of VMT by eliminating the non-residential uses from that designation. It resulted in a 20 percent reduction in non-residential floor area in the net Sunset Area Plan area, and then the Placer Ranch Specific Plan under this alternative will not change.

So for the environmentally superior alternative, we are required to identify one, and to be identified environmentally superior alternative is implementing a no project. So the benefit or the reduced impacts would be related to air quality, land-use compatibility and population and employment growth. It is important to note that under this alternative, you would -- it would result in more severe, significant biological resource impacts associated with the vernal pool habitat. And I just want to point out that this would not meet the primary objectives of the Sunset Area Plan would not or the Placer Ranch Specific Plan objectives.

So I am at the end. So thank you for bearing with me.

CHAIRMAN MOSS: Any questions?

COMMISSIONER HAGUE: Regarding the significant and unavoidables because of other agencies, is the County pursuing any agreements with those other agencies or at least some and the impact on the environmental impact report (unintelligible)?

PH-4

MS. JACOBSON: Yes. I would say we have met with -- well, I can speak to we've had a lot of meetings with the city of Roseville. A lot of those impacts are associated with the city of Roseville. So we've met with them on a continual basis on the Pleasant Grove retention facility as well as the traffic impacts. Those discussions are ongoing. There are no agreements in place to date. I think a lot of the concerns that you made here today or you have already heard may be dealt with in the development agreement for the Placer Ranch project or any future development agreement that comes in for the project.

COMMISSIONER HAGUE: When do we expect the development agreement?

PH-5

MS. JACOBSON: The development agreement will come before your commission when we're ready for deliberations on the project. So it's under -- it's being drafted. It's actually in administrative draft right now, and so we will be -- begin, again, to dive into some negotiations with outside jurisdictions, but

the intent is that that document would be prepared for your commission's consideration.

COMMISSIONER HAGUE: Thank you.

COMMISSIONER JOHNSON: About the relationship with the (unintelligible), you mentioned collecting fair share, and that that's pending with the development agreement or is this something that's already planned and approved?

PH-6

MS. JACOBSON: I may -- I may have to ask -- I believe so, that that will be included in that, but in terms of the mechanism there for the fair share contribution, the mitigation is identified, and I don't know if -- is Rich in the room?

MR. MOREHEAD: Yes.

MS. JACOBSON: You want to come up? Sorry, Rich.

I'm going to have Rich kind of just talk a little bit about -- there is a lot of impacts with (unintelligible) the fair share contributions, so I'll let Rich kind of touch on that.

MR. MOREHEAD: So to answer that directly, you don't get down to the specificity of it, we're using the same mitigation strategy that's been used for the other specific plans in the region. It does say that the fair share contribution. And we start those negotiations

after approval of the plan. It's in the current mitigation measure. We have met with the city of Roseville and we've talked through a lot of the issues that are going on, and one of the things I would like to point out that a lot of those impacts themselves are really the existing plus project impacts. So if you take this entire plan and drop it in today without any improvements in place, once the cumulative setting gets in place and you have -- the improvements are assumed that are funded, those impacts come down to a significantly less level. But the idea would be to negotiate that out after the approval of the documents. You wouldn't have the specificity, but there would be details in the DEA on how that would occur if that helps.

MR. IVALDI: Can you spell your full name for the record, please.

MR. MOREHEAD: Sorry. I'm Richard Morehead with public works.

MR. IVALDI: Thank you.

COMMISSIONER JOHNSON: Thank you.

MS. JACOBSON: Thank you, Rich.

CHAIRMAN MOSS: Any other questions?

COMMISSIONER NADER: I was gonna say I do have some comments related to the landfill and Placer

PH-7

ordinances. I have questions and comments. But maybe those people have been very patient in the room waiting to speak on this. So maybe I'll just wait until after the public comments to make my statements.

CHAIRMAN MOSS: Thank you. Okay. I guess we're getting ready for public comment. It has been expressed to me that there has been concern over the time and available as far as for people who are waiting to speak that might not be able to wait this out. We'd like to remind you that you can submit your comments in writing. You will have no time restraints on you that you will for public comment. So you can maybe elaborate a little more if you'd like to submit those in writing versus getting up to speak or waiting around to speak. That option is certainly available to you.

We'd like to remind everybody that these comments are directed to the environmental document only, not to the merits of the project. We are going to have the timer going. We're going to limit this to three minutes per individual. If you are representing a group, please identify your group you represent, and you will be given up to five minutes. There is a sign-up sheet, and we'll be calling names off of that.

With that being said, Karen?

MR. IVALDI: I have the comment sign-up sheet in

PH-7 cont.

front of me and I have 13 people signed up right now. So what I will do, I'll call three names off at a time so you'll know what order you're in. And we'll get started whenever the commission is ready.

CHAIRMAN MOSS: Please.

MR. IVALDI: First name, and please forgive me if I'm mispronounce any of your names, Ellen Garber, Sue Ingoll, Robin Baral.

MS. GARBER: Good morning, Mr. Chair, and good afternoon, commissioners. My name is Ellen Garber with the law firm of Shute, Mihaly & Weinberger, and I'm speaking on behalf of the city of Roseville. Before we begin our comments on the EIR, I would just like to emphasize the city's complete support of the development of the university in this area as well as of the concept of the proposed project.

The proposed project shares a three-mile common border with the northern boundary of the city of Roseville. In addition, key roadway connections either exist, Fiddyment Road, or a plan to connect to the project area, such as Woodcreek Oaks Boulevard and Foothills Boulevard. Given this interface, this project will have a disproportionate impact on the city of Roseville and its residents and businesses. Therefore, it is imperative that the city and county work together

PH-8

to reduce impacts as much as possible. Because the city cares about the effects of the project, we have reviewed the EIR and will be submitting detailed comments, but would like to take this opportunity to highlight the city's major concerns.

PH-8 cont.

First, the city's concern that the analysis of the Sunset Area Plan is at a program level and is also incomplete, which could understate the impacts of the project. The proposed buildout period for the area plan is 80 years, but the analysis ends in the year 2036, even though specific land uses will become part of the general plan approved and the property will be zoned consistent with those land uses. Therefore, the land-use program at buildout is known at this time and is reasonably foreseeable and has not been analyzed in the EIR.

PH-9

Another major concern -- area of concern is a lack of fully enforceable mitigation measures as required by CEQA to mitigate the impacts of the project in Roseville on traffic and on public services such as police, fire, parks and library services. The EIR fails to disclose the potential for public services such as the city fire department, law enforcement, parks and libraries that will increasingly provide services to new development resulting in increasing service levels and

PH-10

substantial physical deterioration of parks and recreation facilities, necessitating construction of new facilities without assured mitigation from the planning areas. However, the mitigation measures consist of vague statements that the city will negotiate in good faith to achieve a commitment to collect fair share fees with no mechanism in place and no development trigger and no promise to use the fees for the improvements needed to offset impacts in Roseville.

PH-10 cont.

The city's also concerned about the failure to mitigate for the county's proposal to amend the general plan and significantly reduce the land-use buffers around the landfill. This change will almost certainly create significant odor impacts to nearby populations and will create incompatible land uses due to the county's decision to remove the buffer zone land use and replace it with residential and other uses. These impacts will require the joint powers authority, of which the city is a member, to implement additional mitigation in order to avoid odor complaints and regulatory enforcement actions. However, the EIR did not acknowledge the need for mitigation or require the county and/or development in the plan areas to pay for their fair share of the improvements.

PH-11

For drainage impacts, the EIR relies on

PH-12

construction of the city's planned Pleasant Grove detention basin. There is no mitigation requiring the plan areas to fund and maintain future improvements that are directly related to the use of this facility to provide capacity for the project. This analysis needs to be revised and recirculated to acknowledge the potential impacts and provide for enforceable mitigation measures.

PH-12 cont.

Traffic impacts are also of major concern to the city. The EIR concludes that the project will reduce the number of intersections in Roseville operating at level of service E from 84 percent to 68 percent, which is inconsistent with the city's general plan policies. In addition, unsignalized intersections will be reduced from level of service C to an unacceptable level of service F. An example of the significant impact that will not be mitigated is that the development of Foothills Boulevard has been identified as a traffic improvement necessary to support the project. The EIR states that a six-lane facility will ultimately be required.

PH-13

Do I have an extra two minutes?

CHAIRMAN MOSS: I think you've actually had more than the five to start with. I cranked it up a little when you were --

MS. GARBER: Okay. In summary, in the spirit of cooperation forged between the city and county since 1994, the city requests the county to revise it's EIR based on these comments and on the city's written comments. We would request the planning commission to direct staff to work with the city of Roseville to develop appropriate and adequate mitigation to address all offsite impacts between the city of Roseville.

Thank you. Members of the city staff are here and available to answer any questions.

PH-14

CHAIRMAN MOSS: Thank you. Okay. I'd just like to remind you that when the yellow light comes on, that's your one minute warning and time to kind of get your thoughts wrapped up and --

MS. INGOLL: Okay.

CHAIRMAN MOSS: -- so you won't get caught off guard by the red light and the beeping.

MS. INGOLL: All right. I'm representing a large group.

CHAIRMAN MOSS: What group is that?

MS. INGOLL: And that group is the Placer County Solid Waste Task Force. My name is Sue Ingoll, and I'm representing the Solid Waste Task Force today. I'm going to refer to them as the task force, because it's such a long term.

PH-15

Whose on this task force? We have representatives from the cities of Roseville, Rocklin Lincoln, Auburn and Colfax, the town of Loomis, two waste haulers, the landfill and MRF operators, county board of supervisors, county planning commission, an environmental group and the general public.

The task force was established by the boards of supervisors in 1990 to advise the board on matters related to solid waste. I'm here on their behalf. The task force has significant concerns with the proposed modification to the current landfill buffer zone of one mile down to 1,000 or 2,000 feet and urges the county to maintain and enforce existing General Plan Policy 4.2.11. As noted on 4.10-15, the EIR acknowledges that the Placer Air Pollution Control District and the CEQA handbook recommends a screening distance for sanitary landfills of one mile.

PH-15 cont.

Chapter 4.3, the air quality section, pages 4.3-6 and 8, odors. The task force would support the EIR's acknowledgment in the ways that odors can affect people, can cause psychological issues, anger, irritation, anxiety to physiological, of respiratory effects, nausea, vomiting and headaches. By bringing incompatible land uses in close proximity to the landfill, this will expose people to these conditions as

PH-16 cont.

part of their everyday life.

Odor complaints, Table 4.3-3 of the EIR lists the number of current complaints from 2012 to 2017. The EIR does not address how additional complaints would be handled. We think this is insufficient.

Chapter 4.10, land use. The task force is supportive of the findings under impact 4.10-2 that bringing residential development closer to the landfill would result in incompatible use with the landfill. Incompatible land uses could cause conflicts with the current landfill operation. The inherent odors from the landfill Merk (sic) and composting facility could adversely affect the public's ability to participate in outside activities.

Mitigation measure 4.10-2 on the deed notification. The task force appreciates inclusion of such mitigation measures in the deed notification, but the language proposed does not preclude a property owner from seeking legal restitution due to odors. The task force recommends that, to the extent legally permissible, the deed be modified particularly for parcels within the one-mile buffer to the landfill and include language that would prohibit a property owner from litigating against the landfill based on odors. The task force appreciates all the proposed mitigation

PH-16 cont.

PH-17

PH-18

PH-18

measures, but we would like to point out that current technologies do not exist to eliminate or fully mitigate landfill odors inside or out. So imagine buying a new house in Placer Ranch where you can't open your windows due to offensive odors.

PH-19 cont.

Utilities Chapter 4.15, the impact 4.15-11, the EIR states that most likely the odor complaints would not shut down the landfill and makes it a less-than-significant finding. But the task force disagrees and feels that these impacts are -- these are potential impacts and quite real and significant. There have been lawsuits in the past and regulatory actions taken against solid waste facilities such as Newby Island in San Jose and Sunshine Canyon in Southern California. Right now, the landfill is looking at expansion, and say if this type of development was allowed next to the landfill, it could potentially shut the landfill down.

We would like to have these -- we appreciate to have this opportunity to comment on the draft EIR, and we trust that these comments will be given -- that you'll give direction to the county staff and to the county board of supervisors. Thank you for the ability to comment.

PH-20

CHAIRMAN MOSS: Thank you.

MR. IVALDI: Robin Baral is next, and then the next three, Scott Johnson, William Walters or Waters and Jean Getty.

MR. BARAL: Good afternoon, commissioners. My name is Robin Baral. I'm an attorney with Churchwell, White in Sacramento. We are here speaking on behalf of Western Placer Waste Management Authority. It's been a long morning. I'll keep my comments brief.

First, I wanted to acknowledge all the work that's gone into all these documents. I think there is -- when I acknowledge that, you know, it's been a long process. It's been three administrative drafts of the EIR. I want to acknowledge that some of the changes that have been made regarding Placer Ranch and changes to the land uses to try to accommodate proximity to the landfill site, but I think that, you know, generally with regard to the Sunset Area Plan, the authorities generally supportive have been staying (unintelligible) throughout this whole process. Obviously, the major concern we have is with regard to the buffer and making sure that if this project is going to get approved, it needs to be done the right way, implementing all the feasible mitigation that's possible to make sure that we have a reduction in future land-use conflicts as this area builds out.

PH-21

So I just wanted to give you an update that I've been brought on to help the Authority review the project. We've brought on some of our own experts who are looking at some of the odor analysis. We'll be submitting our own comment letter evaluating the existing reports and to sort of build on the collaborative dialogue that's been going on already to make sure that we can help produce the best possible project that will reduce potential land-use conflicts to the maximum extent feasible. And I think part of that process will be to identify additional mitigation measures that can and should be implemented, and as required under CEQA to be implemented to make sure that potential impacts are reduced to the maximum extent feasible.

So I'm not going to go into a lot of details, because it's already been a long morning. But I just wanted to say that I look forward to working with the county and working with the other development stakeholders to make sure that the right set of mitigations are implemented to reduce potential impacts to the site and to reduce potential impacts to the land uses that are proposed to develop within that area.

So thank you.

CHAIRMAN MOSS: Thank you.

PH-21 cont,.

MR. JOHNSON: Hello. I'm Scott Johnson, Bancroft Road, Auburn. I've reviewed the County's draft EIR for the proposed Sunset Area and Placer Ranch Plan, and I have questions, comments and concerns that I respectfully request be addressed by the county.

Table 2-1 of the executive summary lists the 57 significant and unavoidable environmental impacts that would result from implementing the SAP. And some of these impacts are unavoidable because they're outside the jurisdiction of the county; likely expansion of the Pleasant Grove retention facility in the city of Roseville. The environmental document for the expansion of this facility to accommodate the stormwater from the SAP has not been created. Yet the SAP relies entirely on this expansion, and I question whether it's even legal for Placer County to proceed with the SAP process under this tenuous situation. There is no guarantee that there will be anyplace for the stormwater runoff from the SAP to go.

PH-22

Section 3-4 of the project description contains the goals and objectives of both the SAP and PRSP, but the SAP and PRSP are in conflict with these goals in many areas. And my additional written comments will address a number of these conflicts, but here is a couple. The goal -- one goal of the PRSP is to foster a

PH-23

sustainable community design by aiding the county and achieving its objectives for long-term sustainability through project design and building practices that incorporate measures to reduce energy, conserve water, incorporate water-efficient landscaping, treat stormwater and reduce reliance on the automobile. However, the project design does not meet these goals.

PH-23 cont.

Since an initiated Smart Growth Plan, which is being provided to you as an alternative to the SAP, does go much farther than every one of the above-listed, long-term sustainability goals, I think it would prudent for you to recirculate the draft EIR and to allow a full and thorough analysis of the Alliance For Environmental Leadership's Citizen-Initiated Smart Growth Plan.

PH-24

Another goal of the PRSP is to enable blueprint consistency, create a development plan that's consistent with the growth principles identified in the Sacramento Area Council of Government blueprint, which consists of providing high-density residential neighborhoods, more compact forms of development and alternative transportation options, such as bus, rapid transit and bicycle use and the interconnected network of residential neighborhoods, commercial notes and employment centers.

The plan fails to meet the SACOG blueprints and

PH-25

it fails to provide bus, rapid-transit-compliant development, but the citizen plan does.

Thank you.

MR. WATERS: Thank you. I'm William Waters. I am a board member of Sarsis (phonetic spelling). We will be (unintelligible) of Clipper Gap and a lifetime resident of Placer County. As Sarsis we will be commenting. Most of our concerns are with water flow and so forth, the pollution, et cetera. So making it brief, a lot of my concerns have been addressed, but with Jeffrey Moss, I agree. The rail track should be penciled in as a railroad track, not just to the industrial sites, but it should go to the transfer station. Because sooner or later, we're going to be in the same boat as Sacramento County. They're pushing development out towards their dump and the old railroad site. And we're going to have to truck that over the Sierras. But better to put it on the trains. And that's the only place the landfill is going to be suitable for that.

As a -- I've also been an elected member of the Almond Recreation District Board, so I know how boards are supposed to run and in a representative democracy. There is a real problem with this. This has been rolled out from the top down, just like a Communist Chinese

PH-25 cont.

PH-26

PH-27

plan. A lot of these boards of supervisors have already stated that they are driving this plan, and we taxpayers are outraged that we have had to have spent millions of dollars for our supervisors to turn our planners into shills for angelistic (unintelligible).

Thank you.

MR. IVALDI: Okay. Jean Getty. No? Jean Getty. Maybe she's left.

The next three are Veronica Blake, Emily Ward and Leslie Warren.

MS. BLAKE: I'm Veronica Blake, Placer Community Foundation. I'm here today to talk about affordable housing in this project. Although the high density doesn't necessarily mean affordable, it wasn't clear to us why the number of high-density residential units were reduced from the original plan. The EIR doesn't provide a detailed jobs housing balance analysis that evaluates whether the plan provides sufficient housing to accommodate the salaries of the new work force in the plan area.

The EIR states that the plan will comply with the county's requirement of providing ten percent residential units and specific plans to be affordable, but it doesn't provide the specifics on how it will implement housing policies B-4, B-6 and B-13. What we

PH-27 cont.

PH-28

want to know is will the affordable units, will they be spread throughout the different subdivisions or will they be concentrated in one area?

The EIR should also clarify that student housing will not count towards the developments of affordable housing requirements. In-lieu fees should not be accepted for the construction of the affordable -- for construction of affordable units. The project's impact to affordable housing will be significant, and housing elements policies should be used as mitigation measures to help reduce the severity of the impact as required by Government Code 65454. The specific plan needs to be consistent with the county's general plan, and this project should be consistent with the other project EIRs within the county.

PH-28 cont.

Given the challenges in constructing of affordable housing and subsidies that are needed to get those units constructed, the affordable units should receive priority for access to infrastructure, transit, and they should also not have the additional costs associated with being located in the floodplain.

It doesn't appear that any land has been set aside for future light rail or some form of mass transit, and the question -- other than the bus stops. And the question that comes to mind is, Is the density

PH-29

going to be high enough to support rapid transit?

And then lastly, I would just add that we remain concerned about the health impacts of reducing the buffer zone and placing residential near the landfill. It seems that the county years ago had a policy that that buffer zone made a lot of sense. But now that they're developing a project, I don't understand why that buffer zone will be reduced.

PH-29 cont.

Thanks for allowing us to comment.

CHAIRMAN MOSS: Thank you.

MS. BLAKE: Hello, my name is Emily. I am a concerned resident of Roseville. And so I was looking over the draft EIR, and Roseville intersections are already operating at a sub-optimum level, and this plan would allow our intersections to operate at level half, which is the lowest you can go. And this would cause an additional 200 seconds of wait time per vehicle, which would cause a lot of clogging in our intersections.

PH-30

Furthermore, this project does not reserve future transit options, like many of the supporters were suggesting previously. In fact, this plan, the Sunset Area Plan is an urban sprawl and only 17 percent of it is planned as a structure.

PH-31

As far as the environmental impacts, each year this plan will add a combined 600,000 metric tons of C02

PH-32

per year. Not to mention that this suggested buffer zone of 2,000 feet from a landfill will affect children who will be participating in schools, young people who will be participating in colleges and folks who would be representative of work-force housing, which I don't believe is fair.

PH-32 cont.

The county, in their scoping session, have established objectives for this project under CEQA. The project must meet these objectives in their effort, and on almost every objective, this county has failed to do so.

PH-33

So thank you very much for this opportunity to comment.

CHAIRMAN MOSS: Thank you.

MR. IVALDI: After Leslie Warren, Albert Scheiber, Richard Joy, Cheryl Berkinaw.

MS. WARREN: Hello. My name is Leslie Warren, and I'm representing the 14 organizations affiliated with the Alliance For Environmental Leadership. So please afford me five minutes.

The Alliance For Environmental Leadership, as I mentioned, is 14 organizations that have organized to address projects of regional significance. This project is one of regional significance. We have developed, by our initiative and own funding, a parallel development

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plan for the site, which is called the Citizen-Initiated Smart Growth Plan, and I'd like to have it entered into the record that the Citizen-Initiated Smart Growth Plan is -- if we were to compare the county's objective fulfillment in the draft EIR with the project as proposed and with the project that we are proposing, the fulfillment of the county objectives are met with the Citizen-Initiated Smart Growth Plan where they are not met in the county's proposed project, and therefore, we respectfully request that the draft EIR be recirculated and the Citizen-Initiated Smart Growth Plan be evaluated as the environmentally superior alternative six.

PH-34 cont.

The staff made a lengthy presentation to you today, but I feel that the sense of scale about this project was omitted. The footprint of this project is comparable to the existing city of Roseville. The generation of C02 gases is 550,000 metric tons annually, and a metric ton exceeds an American ton by 25 percent. The number of new daily vehicular trips on our existing roadways is 900,000 new vehicles. And when we collect fees to remedy impacts of these new vehicles on intersections, the fees don't generate at the onset of the impact. They accumulate over time, and then there is a huge design construction condemnation, demolition period whenever these intersections will be brought

PH-35

3

forward as to mitigate the impacts that the EIR addresses. So for the county to go forward with a project before the impacts are adequately addressed at the onset, I feel is irresponsible governance.

Basically, we feel that we are evaluating the adequacy of an EIR in evaluating -- that is evaluating a plan, that in its basic framework, is so egregious that it creates the environmental impacts itself. And were we to step back -- and that the EIR basically is mandating impacts in a plan that is structurally flawed. And were we to step back and approach the development of the site in a way that we have done through the Citizen-Initiated Smart Growth Plan, at a framework scale, we would address the significant and unavoidable impacts that the environmental impact report has identified.

PH-35 cont.

Just an example. Were the Citizen-Initiated Smart Growth Plan to be adopted, greenhouse gas emissions would be reduced by 75 percent, and that would be by implementing the county's own declared intentions in the objectives to create compact communities. In the county's plan, the jobs housing balance is 22 jobs for one home, and inasmuch as most of the homes in the Sunset Area Plan/Placer Ranch development are to be built for primary wage earners and most of the employees

PH-36

in the industrial area are going to be hourly blue-collar workers, the jobs housing balance is even more egregious than 22 to 1, because the people that can least afford to commute are going to be the ones commuting to this site because of the housing mix as proposed.

In the Citizen-Initiated Smart Growth Plan, jobs housing balance is three jobs to one home. You may know that the SACOG recommended jobs housing balance as two jobs to one home. And we do this by compact development and integrating the workers with their own residences.

PH-36 cont.

Finally, the EIR fails to relocate the university out of the smell zone in any of its alternatives. We've relocated it out of the smell zone, which I think if the county's objective is to bring a high-class university to Placer County, it's going to need to move it out of the residential smell zone and off of 300 acres of high-quality vernal pools.

PH-37

CHAIRMAN MOSS: Thank you.

MS. WARREN: Thank you for your time.

MR. SCHEIBER: Good afternoon. Albert Scheiber. I'm a resident of Lincoln. My family has a ranch just north of your project. I attended the scoping meeting early on for this project. I made comments in NOP. I was disappointed to find out those comments would not be

PH-38

answered. They would be considered. I know a lot of other people made comments in the NOP and I assume they're getting the same treatment. That's kind of disappointing, because it seems like comments and so on and so forth are just going to get swept under the rug and disregarded, which is a shame.

PH-38 cont.

I also find it troubling that at least two developers tried to make this project work, private developers, and could not. So it baffles me why the county would take on a project that private citizens could not do at the taxpayers' expense.

PH-39

So I have a lot of issues with the EIR itself. There is a lot of inconsistencies in it. I can -- I can see I'm running short on time, so you'll be getting written comments from us during that comment period.

One of the issues I have is with the groundwater and how your project is going to affect the groundwater in the area and sub-basin. I believe that's all just been swept under the rug, no consequences there, even though the county has -- Placer County Water Agency has two wells. We're proposing two more wells. You're going to use them in the dry period as emergency backup is what it states. And if you look at what -- Lincoln's past, Lincoln has existing ground wells that they pull out of. They use a ten percent goal. Nothing

PH-40

committing them to that. They want to put six more wells in for the Village V project, which unfortunately, we're located in. Also, they want to use it in times of backup for a draught.

So I would like to know when the draught hits and you all turn your pumps on, how is that going to affect my well and my water rights? Because none of that's addressed in your EIR.

Thank you.

CHAIRMAN MOSS: Thank you.

MS. BERKINAW: Hi. My name is Cheryl Berkinaw. I'm a Placer County resident, and I'm a representative of Granite Bay, so I'd like five minutes, please.

In December 2018, several concerned citizens made public and written requests of Placer planning that the many projects that were being introduced by planning be rescheduled and staggered appropriately to allow time for public review. Time extensions were also requested due to excessive document sizes, which were far beyond CEQA guidelines. Many of these projects were thousands of pages in length. In addition, several major hearings were also scheduled within the same time frame, such as zoning, text amendments. There are a list of others.

Our concern is the Sunset Area Plan is the largest regional project known, was introduced during

PH-40 cont.

PH-41

this onslaught of document dumping, again, overwhelming the public. The county's website has actually been in a state of migration the past three days. This was also done during almost a month of federal shutdown. So for people to be able to contact the federal government on housing, federal environment issues and for the Placer County conservation program, the timing I would say is not really optimal, and would suggest that a 2019, 120-day review be generated with the addition of the plan that Leslie Warren mentioned for the Citizen-Initiated Growth Plan.

I think that CEQA's purpose is to inform decisionmakers, and if we don't get the opportunity to actually respond and reply because we're inundated with so many thousands of pages of documents, that we're not doing CEQA justice and we're in violation there.

PH-41 cont.

The Sunset industrial plan was previously, approximately a decade ago, made great promises; however, the project objectives were not realized. The Sunset Area Plan was shown not to be economically feasible, the huge associated price tag we have to pay as residents and now we're doing the same thing.

PH-42

We already -- we would like a response as to -- for all the documentation, thousands of pages, again, that have been produced, who is paying for this? We are

no -- the Sunset Area Plan EIR is deficient in the following areas also. I'll skip over the ones that have already been mentioned. But there are no developers committed to th Sunset Area Plan, putting the county and taxpayers at significant risk. The county is the applicant and the approver, which is a conflict of interest. The county has failed to show that the project is economically feasible. There are no innovators mentioned in the DEIR. Stating you're creating an innovation center doesn't mean they will come.

PH-42 cont.

No university is committed to the Sacramento area plan, so what you saw there is pie in the sky. No one has signed from the university. Two other universities have already said that they are not willing to, and have dropped out of the race in terms of putting a university there. Again, objectives are not being met for that university.

PH-43

It would destroy significant vernal pools, habitats and endangered species, and as the planner, we are very disappointed that the planner said that CEQA and NAPA are not being used as responses to all the mitigations. So someone owes a response to the 44 pages of significant and unavoidable impacts. And to put a box around yourself and say that you're not responsible

PH-44

is putting your head in the sand. We are owed those responses from both CEQA and NAPA on the wetlands, both U.S. and on the California environmental impacts.

It's not energy efficient, and there is no mention -- we are living in the 21st Century. There is no mention of any alternative energies being produced. To have a project of this scale, there should be solar, some things that are being presented. Also, in terms of mitigations, CEQA does not allow the promise of future action associated with the mitigation measures that are currently not feasible or funded. Placer County Conservation program has not been adopted, therefore has no mitigation measure. So anything that's current law should be represented as a mitigation measure, and I think you're violating the law by not doing that.

A project of this magnitude requires more than a workshop or public hearing and an article in The Sacramento Bee. I think that it has not been socialized. If you ask almost any resident in Sacramento or Placer County, they will go, "Oh, yeah. I think I saw that picture." They will have no clue the size and impact that's being suggested today. So again, I would suggest that the county spend more money on socializing this project. And I think you have an opportunity -- we had a world-class designer that has

PH-44 cont.

PH-45

PH-46

done designs for some of the most innovative countries in the world present this citizens plan. I hope you understand the gift that you've been given and consider that as an option and put it in the EIR.

Thank you.

CHAIRMAN MOSS: Did we skip Richard?

MR. IVALDI: Yes. I had Richard Choi still on the list, and then the last one Angela Torren, last names on the list.

CHAIRMAN MOSS: Are you Angela?

MS. TORREN: Yes.

CHAIRMAN MOSS: Come on up.

MS. TORREN: I thought I was last, so thank you. Hi. My name is Angela Torren. I'm a resident of Rocklin. I'm a former CPAC chair in the Franklin/Laguna area, and during the time when I reviewed several developments coming into the Elk Grove area before they were incorporated, I did so on behalf of the county supervisors. And at the time, I know that there was a great deal of work put into the specific plans, a great deal of work concerning the mitigating circumstances that the residents might have to experience due to the sewer treatment plant in Elk Grove. I know that there were several similar problems that I see in these particular plans today.

PH-46 cont.

PH-47

I also noted that from my knowledge of the CEQA law, there are requirements that whenever there are significant, unavoidable impacts, however before that particular classification becomes or is deemed acceptable, it should be fully vetted by not only the public, but you here at the planning commission, and that when you are vetting these significant and unavoidable impacts, whether they're air, transportation, and these are great impacts in this large, large project, that you give yourself enough time to reach to various studies and other policies and programs that might support the buildout of this particular plan.

PH-48

I noted that when I was in Elk Grove, that the plans after Laguna town hall was built were approved by the public generally because there was promises that they would bring jobs to the area. Those promises never really fully materialized. The area became a bedroom community at -- you know, at the opposition of many of the people who live there. They were crying about having to commute long distances to work. These are the same experiences we have in Placer County. I'm a 24-year transit pedestrian taker you might say. I availed myself of all transit services in Placer County. I was never able to take any type of a metro downtown,

PH-49

but I went through various cars, using them in traveling. And I really don't want to put that same kind of pressure on the future residents here in Placer County with buildout that doesn't take into serious consideration the significant and avoidable circumstances.

And I say they're avoidable, because I really would like to plead to you today that you find studies, whether they be through SACOG or the air resources board or through various cities who have had similar projects approved, that you find those studies that have significantly, if not successfully, mitigated the significant impacts upon the public, the public health and our children in the future.

Thank you very much for having me today.

CHAIRMAN MOSS: Thank you.

MR. IVALDI: So some folks might have signed up on a list for the other project, so maybe if there is time to ask if there is anybody else who would like to comment on the Sunset Area Plan and Placer Ranch.

CHAIRMAN MOSS: Is there anybody else who did not sign up who would like to address the commission now?

MR. RAVINES: I do believe we did sign up, but anyway, my name is Don Ravines. I'm with the Sierra

PH-49 cont.

PH-50

PH-51

Foothills Audobon Society and our members are in Placer County and in Nevada County. And these comments are on behalf of our audobon society.

The impact I'm going to speak mainly on are greenhouse gas emissions. The impact measure 4.7.2 says this impact would be significant in operational greenhouse gas emissions. Various mitigations are proposed, but are still considered significant and unavoidable. Whether the -- what they're talking about is conforming to Title 16 of building standards, and that would reduce some of the emissions. There is a Title 16 is now Title 19, which is going to be enforced on January 1st, 2020. I might read from that.

"California's 2019 building energy efficiency standards officially take effect on January 1st. Single-family homes built in the 2019 standards will use about seven percent less energy due to energy efficiency measures versus those built under the 2016 standards. One rooftop solar electricity generation spec in homes built under the 2019 standards will use about 53 percent less energy than those in the 2016 standards. This will reduce greenhouse gas emissions by 700,000 metric tons over three years in California."

So we ask that either the building permits are granted this year, given the climate emergency in the

PH-51 cont.

California renewable goals, that these projects be required to meet the 2020, Title 24, Chapter 6 building rules of zero net energy for all single residential homes in the project area. This would reduce your mitigation requirements for this particular project and may even be completely unavoidable -- avoidable at that point, which you'd use the 2019 standards. And I don't know how many permits are going to be allowed before 2020, but I guess at this point, you may not have any.

There is also the -- by 2030, all non-residential home buildings are supposed to reach zero net efficiency also. In lieu of a climate crisis, I would ask that you implement those standards also for non-residential in this area.

PH-51 cont.

You also have certain policies where you are going to encourage people to do things, that they should do things, but we ask the county to include the actual (unintelligible) and set standards that will indicate whether the developer has made sufficient effort to actually implement the standards that are actually used in the building industry. The county EIR are much stronger projected greenhouse gas emissions after the required changes are made.

And finally, just one point that I notice there was nothing in here about requiring solar to be used

anywhere. Many places, like in Nevada County, we have solar farms being proposed. Solar farms are there providing renewable energy, and that might, again, meet the mitigation problems at this project if they had solar providing the energy for this project.

Other questions we raised in the past through this mention all kinds of trails that could use compact and crushed rocks, cheaper, faster, permeable, produces less C02 emissions than concrete. You can plant grass lawns and water conservation leading to less energy use. You can use only lead only for nighttime glare and minimize electric car charges for carbon use, smart glass, Electrochromatic windows, draught-resistant trees, solar P.B. in all the parking lots. There is a lot of things that aren't mentioned in this that would actually make this project more likely to be amenable.

PH-51 cont.

Thank you.

CHAIRMAN MOSS: Thank you. Is there anybody else?

MS. RAVINES: Good afternoon. I expected it to be morning however, and happy Valentine's Day. My name is Barbara Ravines and I live in Nevada County, but I'm very, very interested in this plan, because as residents of Nevada County for 22 years, about the age of the first inception of this plan, I believe, I -- resident,

PH-52

I don't pay taxes here and I vote for -- I don't vote for the politicians making decisions in Placer County, but I do absorb the GHG's, the ozone and the ever-increasing vehicular traffic in the region and the loss of open space, vernal pools, and I'm not especially happy about that.

We've been residents of California for about 52 years, a special and sterling place as the state is, and in those 52 years, it's changed dramatically in this area from the old, dotted landscape that once was rural Placer County. Today we discuss another Placer project opening the county to more sprawl, adding 575,000 metric tons per year of greenhouse gases emissions from the projected 870 daily vehicular trips from the assortment of new housing and industry in the Sunset Plan.

The Sunset Plan would encompass about 14 square miles. It's primarily wetland, grassland, farmland, and give us a new city covering about 80 percent of the surface parking and remainder of buildings. The housing is to be primarily low density, not at all what's needed in the changing demographics and economics of our current world. It does take into consideration, however, the jobs, but -- nearby. However, it's giving us more car travel trips in an already congested area underserved by public transit.

PH-52 cont.

For me, the most glaring and disturbing aspect of this plan is it's utter lack of imagination and concern for climate and what we're witnessing today actually in real time. We've had atmospheric rivers with unprecedented catastrophic fires in our region, every state and every state in the west, the polar vortex. The End Device is a new book which describes the absolute hourly loss of ice in our polar region spelling an evolution of a whole new climate system, and yet this plan is not taking into consideration any of the world that we are going to be facing in the future.

PH-52 cont.

I just urge you to move into this plan that has been described, the Citizen Initiative Plan that Leslie has described and --

PH-53

CHAIRMAN MOSS: Thank you.

MS. RAVINES: -- I'd like to urge you to do that.

Thank you.

MS. SCHEIBER: Good afternoon. Connie Scheiber. We have a ranch up north of your project in Lincoln. First, I want to read a part of the EIR, just a small part. The project will result in the conversion of 72 -- 7,295 acres of farmland, although the actual total would be less because of the fact of the Pleasant -- some areas of Pleasant Grove retention facility property

PH-54

would likely continue to be farmed, although that's not a guarantee. The project would result in the conversion of almost six percent -- let me say that again -- six percent of Placer County's total farmland. This is a considerable contribution to the -- this is a considerable contribution to the significant cumulative impact associated with overall farmland conversion in the region.

My understanding is Placer County has a right to farm county. We're supposed to be pro ag. Once you convert six percent of Placer County's available farmland out of production, that can never be reclaimed. It's gone. It's gone for good. So I'm not really sure how that is pro ag.

The other point I'd like to make is the EIR relies on several entities, I guess, for lack of a better term, that are not really entities yet. The first one is troubling. The Placer County Conservation Program, PCCP, we've been trying to get a draft of that program for probably at least two years. As far as I know, that's still not available for public review. So you're relying on a program that even the public can't look at it and see what it's about.

The Pleasant Grove retention facility, as far as I know, that's still not an entity. They already talked

PH-54 cont.

PH-55

PH-56

about the Ophir Water Treatment Plant. It's not yet even started, no ground broken. And also the groundwater sustainability plan, we go to all those meetings, and I know for sure that that one is not an entity yet.

Thank you for your time.

CHAIRMAN MOSS: Thank you.

MR. WHEELER: Good afternoon. Matt Wheeler, community development director for the city of Lincoln first. I want to say that we consider ourselves a development partner with the county and moving forward with growth plans with Western Placer. And as such, we appreciate the time that your staff has taken to meet with us to talk through this project, our concerns and look through mitigating the issues that have been identified.

One item that we'd like to highlight today is in relation to the landfill buffer, and in a nutshell, it's this: The reduction of the setback in that buffer area for the landfill is not a benefit to ratepayers, solid waste ratepayers in Placer County and the city of Lincoln and other jurisdictions that are outside this plan area. And as such, we don't believe that any of the costs associated with that landfill buffer should be borne by ratepayers outside of that planning area.

PH-56 cont.

PH-57

With that, we appreciate the opportunity to continue to work with your staff and identifying issues and working through the mitigations for growth.

Thank you.

CHAIRMAN MOSS: Thank you. Is there anybody else? All right. Seeing none, we'll go ahead and close the public comment. For this item, there is no action to be taken. So with that, we are going to take about a 15 minute break.

COMMISSIONER NADER: I wanted to comment.

CHAIRMAN MOSS: I'm sorry. Mr. Nader.

COMMISSIONER NADER: I wanted to give the public a little chance to put their comments in, and they've been patient. You want that. There you go.

I first want to say that, you know, I think the rest of the commissioners spent a lot of time going through piles of documents on this, and there is one section that I have to say I'm absolutely bewildered by, and that is relation to the -- we referred to comments on the landfill and Placer Ranch. And it seems to me that, as you read that section, it seems like there should be lots of red lights flashing, like, "Okay. Don't do this."

So I just wanted to highlight just a couple of them as I go through this, and I'll try to be very brief

PH-57 cont.

PH-58

on it. Obviously, the policy, if -- I'm going to go by page on this, 4.10 through 8, and for the policy, the 4-G-11, obviously the thing that jumps out to me is that that policy states that the landfill's the dominant land use in the area, and it is set up to protect these facilities from compatibility. And that should get your attention right away. And the -- and then 4.10.14, as we are looking at consideration of lessening that one mile buffer, incompatibility sort of jumps out right away as soon as that is addressed, and it is expected the complaints lodged about conditions of odors would increase. And that could interfere with the ability for the landfill to expand or modify needed operations. The impact to land-use in the landfill are potentially significant, which is something we hear a lot in this section.

PH-58 cont.

And then as referenced by one of the speakers, 4.10 through 15 mentions the Placer County Air Pollution Control District handbook, and that it also has protection of a buffer within a mile. And it says, also, that it is to protect the incompatibility of the encroachment of development. The landfill is an important and valuable county asset. It has been and will continue to be, as you've heard, the operations go out to 2038, I believe. And then residential

encroachment in that section, it also -- the residential encroachment could create pressure on the landfill operations resulting in the need to entertain other solutions. And then in that section also says would likely be infeasible given the cost.

So it is likely that residential development anywhere in Placer Ranch Specific Plan would be subject to odor from the landfill. So we're not just talking about, you know, 1,000 or 2,000 feet that may be impacted, but throughout the whole project. If the less-restrictive buffer amendment is amended with residential development close to the landfill, it would result in incompatible uses with the landfill. And incompatible is something we hear a lot of in this section.

PH-58 cont.

The odor complaints, going to 4.10 to 16, odor complaints by the landfill could result in enforcement action and/or the addition of additional odor control, which we kind of heard someone else as well. Comparing other landfills to the one in Placer County, in my opinion, is meaningless. Every landfill has unique conditions that are very unique. The terrain and atmospheric conditions play a large role in the impact, it's use of the ground at the landfill. You know, and this is not theoretical. We're not talking about the

possibility of issues. We know we already have issues within a mile. So to me, I mean, we're already -- we're just opening it up to more issues.

Then 4.10 through 17, pressures of the landfill to implement additional odor control. Okay. That's in there. Enclosing compost operations counter -- what is stated in the report is stated that those costs are not -- would not be that significant. I don't know if any of you have been out to the landfill. The green operation is gigantic, and the wind rows are very significant, and to try to cover that would be an extremely expensive process. And really, I think from a standpoint of, okay, if you cover it, where does that odor go anyway? It's all going to be exhausted at some point, and especially in the heated times of the year. Those enclosed structures will obviously cook whatever is in there. And so I'm saying resulting in doing that doesn't ensure that the odors in the operation can be contained.

PH-58 cont.

Transportation. What I'm addressing is what they're saying the landfill could do to mitigate the impact to the surrounding community. Transporting waste to another facility would be extremely costly. Finding an alternative, isolated, non-controversial location within the county to process material of green waste

PH-59

would be nearly impossible, and I think that in this study, if we're looking for alternatives, that needs to be looked at more closely if we make this really into a feasible alternative.

PH-59 cont.

So-called odor neutralizing misters do not eliminate odors. They only cover them up. It's -- obviously a very heavily perfumed, I guess lavender smell might be better than what is coming out of the facility, but I think the effect is pretty questionable.

PH-60

No compensation. And I think this is really important, because it doesn't say this anywhere in the report and it needs to address it. No compensation from the developer or the county has been offered. So the costs related to, a minimum, the impact of the landfill on nearby properties would have to be absorbed by the ratepayers, which somebody else brought that up as well, which constitutes a large segment of the Placer County population. So I think for one project, we're forcing this on the rest of all of Western Placer County to offset the cost of the impact and that really was not addressed. I think that needs to, and I'm saying that it needs to evaluate the impact to the ratepayers.

PH-61

Then 4.10 through 18, I want -- I have a question, and this addresses where the project can do things to offset the impact, over-impact or the impact

PH-62

of the landfill. And where in building designs, landscaping designs and fee restrictions proven truly to lessen the complaints related to the landfill, especially if odor impacts it, it doesn't really say that they have experience in other areas that (unintelligible) for that. These measures would not eliminate the source of odor. It actually, you know, states that in there. Therefore, this impact would be significant and unavoidable.

PH-62 cont.

Almost done. 4.6-3 through 6. Excuse me. 4.3-6, need to specify that the reference to alternate daily cover, and more particularly sludge as it was mentioned, is sewage waste from the nearby Lincoln Water Treatment Plant. It is used to help facilitate the breakdown of waste material on the landfill. The sewage waste was noted as a high contributor to the detection of offensive odors coming from the landfill. So I think that really needs to be addressed about the impact of this sewage sludge that's coming -- that is into the facility, and it doesn't adequately (unintelligible) of sludge.

PH-63

Okay. I counted eight times where incompatibility and questioned compatibility were mentioned in relation to the landfill operations and residential zones. Seems like a fair statement is that

PH-64

this project, as currently proposed, it is now and wide -- a wide-ranging of negative implications of residents of Placer County. In my opinion, we are trying to force a proverbial square peg into a round hole. This plan needs to accommodate the landfill rather than the landfill accommodating the plan. I believe the real test of whether this plan is based on reasonable, acceptable facts is whether the developer or those that prepared the report or any of you in this room would want to live or have any of your family members live in this community. If you're truly being honest, I think the answer is no.

PH-64 cont.

That's my comments. Thank you.

CHAIRMAN MOSS: Thank you. With that, I think we'll take 15 before we get back to our next item. Thank you.

(The hearing on the above item concluded at 1:07 p.m.)

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REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
) ss.
COUNTY OF PLACER)

I LORI G. PINKERTON, a certified shorthand reporter, do hereby certify that the foregoing 120 pages comprise a full, true and correct transcription of the Placer County Planning Commission proceedings had and testimony taken at the Community Development Resource Agency hearing in the hereinbefore-entitled matter.

In witness whereof, I have hereunto set my hand this 6th day of March, 2019.



LORI G. PINKERTON, CSR No. 6031

PH	Public Hearing on the Draft EIR February 14, 2019

Speaker: Commissioner Hague

PH-1 The comment asks a question regarding the potential for future developers moving the landfill buffer even closer to the landfill. The question is responded to by staff. See page 43 of the public hearing transcript.

PH-2 The comment asks whether the project's transit plan considers future alternative transit modes such as driverless cars or pods, and whether the plan includes a transfer station. The design of either the SAP or the PRSP is not at a level of granularity that would identify facilities specific to emerging transportation modes such as autonomous vehicles. Both plans could conceptually support these types of innovations as they emerge.

PH-3 The comment raises issues related to proposed rail use. The question is responded to by staff. See pages 46 and 47 of the public hearing transcript. Also, the questions raised do not relate to environmental impacts or issues regarding the adequacy of the Draft EIR.

PH-4 The commenter asks whether the County is pursuing agreements with other agencies. This comment was addressed by staff during the public hearing, and further information is provided in this response. The County has met with various agencies during the course of the project, including the City of Roseville, City of Rocklin, PCAPCD, WPWMA, UAIC, and PCWA. Also, see Master Response 9: Mitigation and Development Fees.

PH-5 The commenter asks about the timing for the development agreement. This comment was addressed during the public hearing, and further information is provided in this response. The County has drafted the development agreement, which will be revised and updated as discussions with other agencies progress. The development agreement will be provided to the Placer County Planning Commission for review and consideration as part of the project approval process. Also, see Master Response 9: Mitigation and Development Fees.

Speaker: Commissioner Johnson

PH-6 The commenter asks about collecting fair-share payments and the relationship to the development agreement. This comment was addressed during the public hearing, and further information is provided in this response. The County intends to use the same mitigation strategy that has been used for the other specific plans in the region. Negotiations regarding fair-share contributions would be initiated after approval of the specific plan. Also, see Master Response 9: Mitigation and Development Fees.

Speaker: Commissioner Nader

PH-7 The commenter has questions and comments related to the landfill and Placer County ordinances but will hold them until after the public comments have been provided. See responses to comments PH-58 through PH-64, below, which address these questions and comments.

Speaker: Ellen Garber

PH-8 The comment is an introductory remark by the commenter, as a representative of the City of Roseville. In addition to oral comments, the City of Roseville also submitted a written letter. See responses to comment letter 4.

PH-9 The comment expresses concern about the Draft EIR's programmatic analysis of the project, and states that the analysis is incomplete. See Master Response 7: Program- vs. Project-Level Analysis.

Regarding the comment about buildout projections, see response to comment 12-7. Regarding the cumulative traffic impacts, see response to comment 4-13. Also, see responses to comments 12-8

through 12-13 regarding how the buildout projections relate to the Draft EIR impact analysis. For the reasons discussed therein, the Draft EIR analysis is adequate and no changes to the Draft EIR are necessary in response to this comment.

PH-10 The comment expresses concern that the Draft EIR does not include fully enforceable mitigation measures, including for impacts related to traffic and public services. More detailed comments related to mitigation measures are provided in comment letter 4; see responses to comment letter 4. See also Master Response 9: Mitigation and Development Fees.

PH-11 The comment raises issues related to the landfill buffer, odors, and mitigation (including issues related to funding). See Master Response 4: Odors for a discussion of impacts related to odor, as well as fair-share mitigation fees.

PH-12 The comment asks that additional mitigation measures be developed to ensure that funding is available to maintain and improve the stormwater detention basins that the project area relies on. See response to comment 52-14 and Master Response 6: Drainage and Flooding.

PH-13 The comment identifies that the project would result in significant impacts related to intersection operation in the city. The commenter does not identify an issue with the adequacy of the analysis of the Draft EIR. The comment suggests that Foothills Boulevard is an "example of a significant impact that will not be mitigated." It is not clear what is meant by this; however, issues related to Foothills Boulevard were raised in the letter submitted by the City of Roseville (Letter 4) and are addressed in many responses to comments, including 4-4, 4-27, 4-32, 4-34, and 4-74. See those comments regarding issues related to Foothills Boulevard.

PH-14 The comment requests that the County revise the Draft EIR in response to oral and written comments provided by the City of Roseville. Regarding revisions to the Draft EIR, all comments received during the public review period for the Draft EIR have been considered and responses to these comments are provided in this Final EIR. Where responses have resulted in the need to revise the Draft EIR, these are identified in Chapter 2, "Revisions to the Draft EIR," in this document.

Further, the comment requests that the County work with the City of Roseville to develop appropriate and adequate mitigation. The County has met repeatedly with City staff.

Speaker: Sue Ingle

PH-15 The comment raises issues related to the landfill buffer. See Master Response 4: Odors for a discussion of impacts related to the landfill and odor.

PH-16 The comment identifies text in the Draft EIR that describes the range of human reaction to odors. Many of the reactions described in this range would be in response to an intense odor. It is false to suggest that because the Draft EIR discloses the full range of potential human reaction to odor that that these reactions could result from the project. See Master Response 4: Odors.

PH-17 The comment raises issues related to a potential increase in odor complaints and how those would be handled. See Master Response 4: Odors.

PH-18 The comment raises issues related to the landfill and odor. See Master Response 4: Odors for a discussion of impacts related to the landfill and odor.

PH-19 The comment requests that text be added to the deed restriction mitigation that would prohibit a future property owner from litigating against the landfill based on odors. This is a legal issue and does not relate to environmental impacts. See Master Response 4: Odors for additional discussion regarding impacts related to the landfill and odor.

PH-20 The comment raises issues with the Draft EIR's conclusion for Impact 4.15-11, which evaluates potential impacts on WRSL from incompatible land use that results in insufficient permitted capacity to serve waste disposal needs. The comment suggests that other lawsuits and regulatory actions have been taken against other solid waste facilities. See Master Response 4: Odors.

Speaker: Robin Baral

PH-21 The commenter's statements about providing additional mitigation measures are noted and included in the record. See Master Response 4: Odors for a discussion of impacts related to the landfill and odor, including mitigation measures.

Speaker: Scott Johnson

In addition to oral comments, the commenter also submitted several written letters. See responses to comment letters 51 and 52.

PH-22 The comment expresses concern regarding the project's proposal to expand the Pleasant Grove Retention facility and notes that the environmental document for this expansion has not been prepared. The comment suggests that the project relies entirely on this expansion and that there is no guarantee that stormwater runoff would be mitigated. The commenter raises a similar issue in the letter he submitted (Letter 51). See response to comment 51-1.

PH-23 The comment suggests that both the SAP and the PRSP are inconsistent with their stated goals and objectives and, in particular, that the PRSP is inconsistent with its objective to foster sustainable community design. Section 1 of the PRSP includes an objective for the project to incorporate design and construction measures to reduce energy usage, conserve water, incorporate water efficient landscaping, treat stormwater, and reduce automobile reliance. The PRSP's Utilities plan (Section 9) and Design Guidelines (Sections 2 and 6) include various requirements for future development in the PRSP area, which collectively address this objective. Through implementation of the PRSP, future development projects would be required to: (1) reduce water usage through measures such as turf reduction and recirculating hot water systems; (2) install landscaping that complies with Placer County's adopted Model Water Efficient Landscape Ordinance in order to reduce water use; (3) manage stormwater by including source control measures, site design measures, and hydromodification treatment features in order to reduce pollutants in stormwater and to reduce the quantity of runoff from a developed site; and (4) incorporate a mixed-use Town Center district with high-intensity non-residential uses and high-density residential uses in order to reduce automobile reliance by siting residential, employment, and service uses within walkable proximity to one another. As designed, the PRSP includes design features and implementation mechanisms that achieve its objective regarding sustainable community design.

PH-24 Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative. Also see Master Response 8: Recirculation.

PH-25 The comment suggests that the PRSP is inconsistent with its stated objective to enable Blueprint consistency consistent with the smart growth principles identified in SACOG's Blueprint. This comment raises similar issues as comment 56-12. See response to comment 56-12.

Speaker: William Wauters

PH-26 The comment indicates that a rail line should be extended to the transfer station. The comment does not raise issues related to environmental impacts or related to issues with the adequacy of the Draft EIR. No further response is provided.

PH-27 This comment raises issues with the planning process, including financial issues. The comment does not identify environmental issues or issues related to the analysis, conclusions, or adequacy of the Draft EIR. No further response is necessary.

Speaker: Veronica Blake

PH-28 The commenter raises several issues related to affordable housing. These issues are consistent with the issues raised in Letter 18. See responses to Letter 18.

PH-29 The comment questions whether the project's density would support transit and also raises issues related to health impacts associated with the landfill buffer reduction. The comments related to density and transit relate to planning and are not related to an environmental issue. Regarding odor-related health impacts, see Master Response 4: Odors.

Speaker: Emily Ward

In addition to oral comments, the commenter also submitted a written letter. See responses to comment letter 70.

PH-30 The comment raises issues related to traffic congestion. Traffic-related impacts are evaluated in Section 4.14 of the Draft EIR. The comment does not raise issues related to the adequacy of the Draft EIR's analysis.

PH-31 The comment suggests that the project does not reserve future transit options. The PRSP includes a public transit facilities diagram (See Draft EIR Exhibit 3-18), which identifies a conceptual bus rapid transit route, local bus service route, as well as bus pull-out and shelter locations and a potential park-and-ride location. The Draft EIR (page 3-26) also includes a description of proposed future transit in the SAP:

> The SAP includes goals and policies that promote transit, including requiring complete street design that includes transit accessibility and priority, promoting collaboration with transit agencies to update their transit plans to include the SAP area, and encouraging major employers to provide shuttles for employees. It is also expected that development that would occur with implementation of the SAP would increase demand for local public transit services, which would promote development of regional transit services and facilities. This includes the BRT line proposed by Placer County Transportation Planning Agency as part of its 2008 South Placer County Bus Rapid Transit Service Plan. The BRT line is proposed to run through the SAP area and would provide express commuter service connection with regional employment centers and transit hubs in the SAP area.

PH-32 The comment raises issues with the project's GHG emissions and the landfill buffer. The Draft EIR evaluates GHG emissions in Section 4.7. The Draft EIR evaluates odor related impacts in Section 4.3, "Air Quality"; Section 4.10, "Land Use"; and Section 4.15, "Utilities." The comment does not raise issues with the adequacy of the Draft EIR's analysis.

PH-33 The comment states that the project does not meet the CEQA project objectives; however, the comment does not provide any specific objectives not met or reasons why objectives were not met. The project would meet the project objectives. No further response is warranted.

Speaker: Leslie Warren

PH-34 The comment is an introductory remark by the commenter, as a representative of the Alliance for Environmental Leadership. In addition to oral comments, the Alliance for Environmental Leadership also submitted a written letter. See responses to comment letter 11.

PH-35 The comment describes the scale of the plan and suggests that the scale of the plan could, itself, result in environmental impacts. The comment recommends development of the CISGP, which the comment suggests would address significant and unavoidable impacts. The Draft EIR evaluates the impacts of the proposed SAP/PRSP at its proposed scale and configuration. Regarding the suggestion to development the CISGP, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity.

PH-36 Regarding the comment that the CISGP would reduce GHG emissions and improve the jobs/housing balance compared to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. (It should be noted that the comment's suggestion that the proposed SAP/PRSP would result in a jobs-to-housing ration of 22:1 is false.) The internal jobs-to-housing ratio of the proposed SAP/PRSP would be approximately 7:1. As discussed in the master response, while the CISGP would result in an internal jobs/housing balance, the CISGP does not help the jobs/housing balance in the project vicinity, which is more housing heavy. As explained in the Draft EIR (page 4.12-5), the market analysis prepared for the Sunset Industrial Area Plan update noted that prevailing literature shows that a ratio of 1.5 is ideal (EPS 2015:42). In 2012, the South Placer area had approximately 1.31 jobs for every housing unit, indicating that South Placer should add more employment opportunities to strike a better balance (EPS 2015:42). More specifically, the Draft EIR (page 4.12-13) states while Rocklin and Roseville have ratios of 1.24 and 1.22, respectively, the overall ratio for the whole of Placer County is 1.08. Looking strictly at the numbers for buildout of the net SAP and PRSP areas, the project would add substantially more jobs than housing units, making it a "jobs-rich" area. Viewed in the context of all of Placer County, the project's contribution would serve to provide more balance to Placer County.

PH-37 Regarding the comment that the CISGP would relocate the proposed university outside of the "smell zone" and off 300 acres of high-quality vernal pools compared to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. It is important to note that the "small zone" associated with the WRSL exists beyond the 1-mile buffer. Exhibit 4.3-1 in the Draft EIR shows a map of the recent odor-complaint locations, which extend well outside of the SAP area (and therefore well outside the 1-mile buffer). The suggestion that the CISGP would place the university in an area not affected by landfill odors is false. It is also important to note that, although it is true the SAP/PRSP's proposed university site is located within land designated by the USACE as "Vernal Pool Recovery Plan Core Area," this does not mean that the university site covers "300 acres of high-quality vernal pools." A wetland delineation was conducted for the PRSP area and found that the entire PRSP area contains 11.36 acres of vernal pools, of which 4.32 acres would be affected by the project.

Speaker: Albert Scheiber

PH-38 In addition to oral comments, the commenter also submitted a written letter. See responses to comment letter 65. The comment questions why comments provided in response to the project's NOP were not addressed. See responses to comment letter 65.

PH-39 The comment notes that two developers could not make project work and expresses concern regarding why the Board of Supervisors would process the PRSP at the taxpayer's expenses. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. This comment is noted for consideration.

Speaker: Cheryl Berkema

In addition to oral comments, the commenter also submitted several written letters. See responses to comment letters 35, 36, and 37.

PH-40 The comment expresses concern that the emergency use of the groundwater wells located in the plan area would affect adjacent private wells. This comment is similar to comment 65-3, which addresses a written comment submitted by the same individual. As described in response to comment 65-3, groundwater wells would be reserved for emergency and back-up use. If the need arose to use groundwater from these wells, they would be operated only during a single dry year. If additional water is needed beyond the first year, it would be obtained from surface water sources as described in the 2007 Western Placer County Groundwater Management Plan (GMP) which includes regular groundwater monitoring in accordance with California Water Code Section 10750. Additionally, PCWA and partner water agencies are working to expand the existing network of 32 groundwater monitoring wells to include at least one monitoring well within each unit of a 5-square-mile grid (PCWA 2007). Because the groundwater wells within the project area would be reserved for emergency use, would be operated in accordance with the GMP, and regional groundwater levels would be monitored in accordance with California Water Code Section 10750, groundwater levels near the plan area wells would remain at an elevation that does not adversely affect adjacent wells or groundwater uses. See Impact 4.9-2 in the Draft EIR for additional discussion.

PH-41 The comment notes that given the size of the Draft EIR more time is needed to review the Draft EIR and provide comment and requests a 120-day public review period. The comment expresses concern regarding the County releasing many project documents for public review at the same time and doing so during the government shutdown. The comment expresses support for the CISGP and notes that CEQA's purpose is to inform decision makers. See responses to comments 11-1, 32-1, and 40-1 regarding CEQA requirements for public review periods, CEQA page limit recommendations, and requests for extension of the comment period.

PH-42 The comment notes that the project is not economically feasible and that no developers have committed to the project putting taxpayers at risk. The comment notes that the County, as both applicant and approver, has a conflict of interest. The comment also notes that there are no innovators mentioned in the Draft EIR. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. This comment is noted for consideration.

PH-43 The comment expresses concern that no university has committed to the plan. The County has been actively working with California State University Sacramento representatives on the preparation of the SAP, PRSP, and EIR. It is anticipated that following adoption of the SAP and PRSP and after donation of the campus site to the University, the County and the University will enter into an MOU to memorialize the commitment for construction of the University. The County has engaged in discussions with the California State University representatives and the property owner. The property owner intends to dedicate the university property. Chapter 3, "Project Description," of the Draft EIR notes that the university property is proposed for the California State University Sacramento-Placer Campus; however, development of the site would be dependent on the property owner and university entering into separate agreements for land donation and the university engaging in its own master planning efforts.

PH-44 The comment states that the project would destroy significant vernal pools, habitats, and endangered species. These impacts are addressed in the Draft EIR in Section 4.4, "Biological Resources." As described therein, mitigation is identified to reduce potentially significant and significant impacts. Where mitigation is unavailable or available but unable to reduce impacts to below the thresholds of significance, impacts are determined to be significant and unavoidable. Section 5.1, "Significant and Unavoidable Impacts," of the Draft EIR lists the project's significant and unavoidable impacts. Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

PH-45 The comment states that the project is not energy efficient, and the Draft EIR does not mention any alternative energies being produced, including solar energy. This is incorrect. Energy efficiency is addressed in the Draft EIR in Section 4.16, "Energy." The County's General Plan, with which the project must comply, includes energy efficiency goals that are listed in the Draft EIR on page 4.16-7. Specifically, General Plan Policy G-3 directs the County to implement provisions of the Subdivision Map Act that require subdivisions to be oriented for solar access, to the extent practical. Likewise, the SAP includes goals and policies related to energy consumption, which are listed on pages 4.16-9 through 4.16-14 of the Draft EIR. Solar is specifically mentioned in SAP Policies LU/ED-3.5, NR-5.9, NR-6.2, and NR-6.7 (which was revised to require solar photovoltaic systems and other energy efficiency measures on residential development; see Master Response 5: Greenhouse Gas Mitigation for the specific text changes).

Regarding the comment about CEQA requirements for mitigation, see Master Response 3: Placer County Conservation Program and Mitigation.

PH-46 The comment expresses concern regarding public outreach and public notification. The comment also expresses support for the CISGP. All public notification for the preparation of the Draft EIR has been conducted in accordance with CEQA. See responses to comment 32-1 and 40-1 regarding CEQA requirements for public review periods.

Speaker: Angela Torrens

PH-47 The comment is an introductory remark by the commenter. In addition to oral comments, the commenter also submitted a written letter. See responses to comment letter 69.

PH-48 The comment is regarding the project's significant and unavoidable impacts. See response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

PH-49 The comment expresses concern about project-related traffic and transit services. These issues are addressed in Section 4.14, "Transportation and Circulation," of the Draft EIR. No specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. No further response is warranted.

PH-50 The comment suggests that the County find studies from other agencies that have mitigated significant impacts; however, the comment does not reference any specific studies or identify any specific mitigation measures. Therefore, a response cannot be provided.

Also, see response to comment 36-3 regarding CEQA requirements for significant and unavoidable impacts.

Speaker: Don Rivenes

PH-51 The comment recommends that building permits granted this year should be required to meet the 2020 Title 24 Chapter 6 building standards requiring zero net energy for residences. Given the time necessary for site preparation, the first building permits in the PRSP area would not be issued until well-after January 2020; therefore, the 2019 Title 24 standards (required for buildings permitted after January 1, 2020) would be required. It should be noted that the GHG analysis in the Draft EIR was conservative by identifying the 2016 Title 24 code, rather than assuming all development would meet the more stringent 2019 code. No revisions to the Draft EIR are necessary.

Speaker: Barbara Rivenes

PH-52 In addition to oral comments, the commenter also submitted a written letter. See responses to comment letter 28.

The comment expresses concern about the project's GHG, traffic, and housing impacts as well as the project's purported lack of concern for the climate. These issues are addressed in the Draft EIR in Sections 4.7, "Greenhouse Gas Emissions"; 4.14, "Transportation and Circulation"; and 4.12,

"Population, Employment, and Housing." As for the commenter's climate-related concerns, see, for example, Sections 4.6, "Geology and Soils," which addresses geologic hazards (including natural hazards associated with landslides, faulting, and avalanches); 4.7, "Greenhouse Gas Emissions," which addresses GHG emissions and climate change; 4.8, "Hazards and Hazardous Materials," which addresses the potential for wildland fire; and 4.9, "Hydrology and Water Quality," which addresses risks associated with flooding.

PH-53 Regarding the suggestion that the County evaluate the CISGP as an alternative to the project, see Master Response 2: Citizen-Initiated Smart Growth Plan. As noted in the master response, after a thorough review of the CISGP, the County found that the plan is infeasible, would not meet primary project objectives, and would result in greater impacts with respect to several environmental issue areas. Also, the Draft EIR includes Alternative 4: Reduced Footprint, Similar Development Potential, which achieves similar impact reductions as the CISGP (i.e., biological resources) without resulting in increases in the severity of other impacts, such as GHG and traffic. Therefore, as concluded in the master response, the Draft EIR is not revised to include the CISGP as a project alternative. Also see Master Response 8: Recirculation.

Speaker: Connie Scheiber

PH-54 The comment reiterates the Draft EIR conclusion on page 4.2-18 that the project would make a considerable contribution to the significant cumulative impact associated with overall farmland conversion in the region. This cumulative impact is determined to be significant and unavoidable in the Draft EIR. Further, the comment states that Placer County is a Right-to-Farm county that is supposed to be pro agriculture. The County's Right-to-Farm Ordinance is described on pages 4.2-11 and 4.2-12 of the Draft EIR. The project's potential to indirectly convert farmland and/or conflict with land use buffers for agricultural operation is discussed under Impact 4.2-3 on pages 4.2-15 through 4.2-17 of the Draft EIR, wherein the impact is determined to be less than significant because it would be subject to land use buffers between agricultural and nonagricultural uses, and because some agricultural areas adjacent to the PRSP area are planned to be developed as nonagricultural uses.

PH-55 The comment states that the Draft EIR relies on the PCCP, which is not available for public review. See response to comments 16-3 and 63-3. Also see Master Response 3: Placer County Conservation Program and Mitigation.

PH-56 The comment notes that the Pleasant Grove Retention Facility is not an entity, that the Ophir Water Treatment Plan is not constructed and that the ground water sustainability plan is not an entity. The Draft EIR identifies these facilities as proposed, not completed, or under construction. The Draft EIR also does not treat the groundwater sustainability plan as a completed plan. The comment does not raise issues with the accuracy of the Draft EIR's description of these facilities and plans. Therefore, no further response is warranted.

Speaker: Matt Wheeler

PH-57 The comment expresses concern that existing ratepayers should not participate in the cost of the landfill buffer reduction. The landfill buffer is a County land use policy. The proposed reductions in the General Plan buffer policy have been analyzed in the Draft EIR, and mitigation measures have been identified to reduce significant impact so the extent feasible (although not to a less-than-significant level). However, the specific source of mitigation funds is not an environmental issue. Also, see Master Response 4: Odors.

Speaker: Commissioner Nader

PH-58 The comment raises issues related to the landfill buffer, odors, and land use compatibility. See Master Response 4: Odors for a discussion of odor impacts. See also response to comment 61-5.

PH-59 The comment indicates that finding an alternative landfill site would be nearly impossible but suggests that such an alternative should be evaluated in the Draft EIR. The County does not have

authority to relocate portions of WPWMA's facilities/operations; therefore, it cannot be considered as a feasible alternative for reducing odor impacts. Such an alternative is therefore not evaluated in the Draft EIR.

PH-60 The comment raises issues related to odor-neutralizing misters. See response to comment 61-5.

PH-61 See response to comment PH-57 regarding the landfill buffer. Also, see Master Response 4: Odors.

PH-62 The comment raises issues related to building design and feasible mitigation. See Master Response 4: Odors for a discussion of odor impacts.

PH-63 The commenter indicates that sewer sludge disposal at the landfill is an issue that needs to be addressed. The Draft EIR, p. 4.3-52, identifies immediate covering or burying sewer sludge as an odor-reducing mitigation measure that could be implemented by WPWMA. See Master Response 4: Odors, which identifies revision to the Draft EIR to incorporate this measure as part of new Mitigation Measure 4.3-6b.

PH-64 The comment expresses concern with impacts associated with incompatible land uses and expresses concern regarding implications to residents of Placer County. The comment notes that the project should accommodate the landfill rather than the landfill accommodating the project. The comment questions where residents would want to live in the community. These comments do not raise issues with the analysis or conclusions of the Draft EIR. These comments raise issues for the Board of Supervisors to consider before approving the project.

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4 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Public Resources Code [PRC] Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for the project because the EIR identifies potential significant adverse impacts related to the project implementation, and mitigation measure have been identified to reduce those impacts. Adoption of the MMRP would occur along with approval of the project and certification of the EIR.

4.2 STANDARD MITIGATION MONITORING PROGRAM

Placer County has adopted a standard mitigation monitoring program (Section 18.28.030 of the Placer County Environmental Review Ordinance) in order to implement PRC Section 21081.6. This program requires that mitigation measures recommended for discretionary projects, such as the SAP/PRSP Project, be included in the conditions of approval monitored by the County through a variety of permit processes, including (but not limited to) those listed below.

- Improvements Plan Approval,
- Improvements Construction Inspection,
- Encroachment Permit,
- Final Map Recordation,
- Acceptance of Project as Complete,
- Grading Permit Issuance, and
- Building Permit Issuance.

Placer County includes all mitigation measures from a project's environmental review document in the project's Conditions of Approval (COAs). The County's Environmental Review Committee (ERC) collaborates with, and is typically the same review staff for, the County's Design Review Committee (DRC) to ensure the COAs are enforced throughout project improvement plan review, construction, final map recordation, and operation, as appropriate. Satisfaction of the COAs is monitored and tracked via the improvement plan review process electronic filing system, as well as the County's electronic permit tracking system. Improvement plans are sent by the Engineering and Surveying Division (ESD) to all reviewers, including but not limited to Planning Services, Environmental Health, Air Quality, Fire, and the Department of Public Works divisions of Parks, Environmental Engineering, and Transportation, with review and signoff from each reviewer required prior to improvement plan approval. Progression through the improvement plan approval and construction process is dependent on satisfaction of the project's COAs. Planning Services staff attend ESD's mandatory pre-construction meetings with the project owner, engineer, and contractor to ensure COAs/mitigation measures protections are in place prior to any on-site disturbance. In addition, County inspectors have the authority to shut down construction activities if COAs/mitigation measures are not being properly satisfied. The County's monitoring and tracking of compliance with the COAs/mitigation measures are funded by the developer as part of the improvement plan review and construction inspection process. Project construction is not accepted as complete by the County until all DRC reviewers and outside agencies have signed off on the improvements.

4.3 REQUIRED APPROVALS AND PERMITS

The issuance of any of the listed permits or County actions must be preceded by verification by County staff that COAs/mitigation measures have been met. This verification shall serve as the required monitoring for those COAs/mitigation measures. All of the mitigation measures for the SAP/PRSP Project included in the EIR would be monitored through the County's Standard Mitigation Monitoring Program. As indicated in the text of each mitigation measure, compliance with each would be verified by County staff before issuance of required approvals and permits. Table 4-1 identifies each mitigation measure that would be monitored through the County's Standard Mitigation Monitoring Program. In addition, some mitigation measures require ongoing implementation and would require monitoring after the point at which a Final Map is recorded, a Certificate of Occupancy is issued, or other discretionary permit is vested or ministerial permit is accepted as complete. Table 4-1 also identifies the mitigation measures that require ongoing implementation, the party(ies) responsible for implementation, the necessary timing of implementation that would occur outside the scope of the County's Standard Mitigation Monitoring Program, and the mechanisms for monitoring compliance with each mitigation measure.

4.4 TABLE FORMAT

Table 4-1 includes four columns. If a Draft EIR topic, such as biological resources, includes mitigation measures, it is included in the first column of the MMRP table. The fist column identifies the mitigation measure and includes the mitigation measure number, title, and text, and reflects changes made to the Draft EIR (See Chapter 2, "Revisions to the Draft EIR"). The same numbering system for mitigation measures (4.1-1a, 4.1-1b, 4.1-2, etc.) is carried over from the Draft EIR discussion into the table. If an issue addressed in the Draft EIR does not result in mitigation, it is not included in the table.

The second column of Table 4-1 identifies the applicable project area. As explained in the Draft EIR (p. 4-6), the various project areas are described as follows:

- The "Net SAP Area" is the SAP area except for the PRSP area and the other locations discussed below.
- The "PRSP Area" includes the PRSP area and PRSP-supporting infrastructure within the net SAP area.
- The "Other Supporting Infrastructure" includes the Pleasant Grove Retention Basin located within the City of Roseville's jurisdiction, and the locations of the other off-site roadway and utility improvements also within the City of Roseville jurisdiction. (See Draft EIR Chapter 3, "Project Description," for details.)

Each mitigation measure specifies the applicable project area to which the measure applies.

The third column of Table 4-1 identifies the agency responsible for enforcing and monitoring each mitigation measure. Sometimes multiple agencies are identified. When the County is the agency responsible for monitoring/enforcing mitigation, the specific department is identified.

The fourth column of Table 4-1 identifies the timing of the initial action, or the "trigger" for implementing the mitigation measure.

The fifth and last column of Table 4-1 identifies the frequency and duration of monitoring. This concept is described briefly above, under "Required Permits and Approvals." In many cases, the mitigation measure is tied to a specific County approval, such as "prior to issuance of building permits." In such cases, the duration of the monitoring is usually limited to the completion of the County approval and no ongoing monitoring is identified.

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
4.1 Aesthetics				
Mitigation Measure 4.1-3a: Shield and angle nighttime construction lighting downwards (Net SAP Area and PRSP Area) Before issuance of grading or building permits for the net SAP and PRSP areas, a note shall be identified on the grading or other improvement plans requiring construction managers or contractors to include shielding on all nighttime lighting used for construction activities and angle all such lighting downwards.	Net SAP Area and PRSP Area	Placer County Planning Services Division	With submittal of design review application or grading/improvement plans	Satisfied with construction inspection
Mitigation Measure 4.1-3b: Shield and angle nighttime construction lighting downwards (Pleasant Grove Retention Facility and Off-Site Transportation and Utility Improvements) The County shall coordinate with the City of Roseville with regard to mitigation for nighttime lighting impacts during construction of the Pleasant Grove Retention Facility and off-site transportation and utility improvements, which are located in the City of Roseville, including shielding for all nighttime lighting used for construction activities and to angle all such lighting downwards.	Pleasant Grove Retention Facility and Off-Site Transportation and Utility Improvements	Placer County Planning Services Division and City of Roseville	During construction of the Pleasant Grove Retention Facility and off-site transportation and utility improvements	Continuously during project construction of the Pleasant Grove Retention Facility and off-site transportation and utility improvements
4.2 Agricultural Resources				
Mitigation Measure 4.2-1a: Preserve Farmland (Net SAP Area and PRSP Area) Farmland, as defined under the Placer County CEQA Checklist, shall be preserved in Placer County at a minimum ratio of 1:1, or in accordance with the PCCP at such time it is adopted, for each acre of Farmland converted to nonagricultural use. This is to be accomplished through the approval and implementation of a series of Farmland preservation management plans that address management of specific properties to be preserved for mitigation of converted Farmland. According to the requirements specified below, Farmland preservation management plans for individual preserve sites will accompany each proposed development project, or group of projects, in the net SAP and PRSP areas. No additional mitigation to address the loss of Farmland is required, as long as a substantial portion (as determined by the planning director in consultation with the County agricultural commissioner) of the mitigation lands acquired is undeveloped. Such lands must also have an NRCS soils classification or DOC categorization of the same or greater value than Farmland converted to nonagricultural uses. Mitigation lands will be protected by agricultural conservation easements containing restrictive encumbrances in a form deemed acceptable to and approved by the County. Farmland preserved for the purpose of habitat mitigation may be counted toward the Farmland mitigation measure if the preserved land has the same or better NRCS or DOC classification as the Farmland being converted to nonagricultural use.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Farmland preservation management plans or PCCP fee payment with submittal of improvement plans	Satisfied with County approval of farmland preservation management plans or fee payment, as applicable

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.2-1b: Preserve Farmland (Pleasant Grove Retention Facility) The County shall coordinate with the City of Roseville in an effort to preserve Farmland in Placer County at a ratio of 1.35:1 for each acre of Farmland converted to nonagricultural use. This could be accomplished through the approval and implementation of a series of Farmland preservation management plans that address management of specific properties to be preserved for mitigation of converted Farmland. No additional mitigation to address the loss of Farmland would be required beyond the 1.35:1 requirement noted above as long as a substantial portion, as determined by the City's planning director, in consultation with the County agricultural commissioner, of the mitigation lands acquired is undeveloped and has an NRCS soils classification or DOC categorization of the same or greater value than Farmland converted to nonagricultural uses on the Pleasant Grove Retention Facility property. Mitigation lands would be protected by agricultural conservation easements containing restrictive encumbrances in a form deemed acceptable to and approved by the City. Farmland preserved for the purpose of habitat mitigation may be counted toward the Farmland mitigation measure if the preserved land has the same or better NRCS or DOC classification as the Farmland being converted to nonagricultural use.	Pleasant Grove Retention Facility	Placer County Planning Services Division and City of Roseville	Prepare farmland preservation management plans prior to construction	Satisfied with City approval of farmland preservation management plans
4.3 Air Quality				
Mitigation Measure 4.3-2a: Implement PCAPCD's recommended construction mitigation measures (Net SAP Area and PRSP Area) Project proponents shall require their construction contractors to implement all of PCAPCD's recommended construction mitigation measures in place at the time of grading / improvement plan submittal. At the time of writing this EIR, PCAPCD's recommended construction mitigation measures include measures to address exhaust emissions and dust control (PCAPCD 2017a). This measure would assist the project in achieving compliance with SAP Policies NR-5.4 and NR-5.5. ◢ Prior construction activity, the contractor shall submit a Construction Emission/Dust Control Plan to Placer County Air Pollution Control District (PCAPCD) when the project area to be disturbed is greater than one acre. The Dust Control Plan shall be submitted to the APCD a minimum of 21 days before construction activity is scheduled to commence. The Dust Control Plan can be submitted online via the fill-in form: http://www.placerair.org/dustcontrolrequirements/dustcontrolform. ◢ The contractor shall submit to the PCAPCD a comprehensive equipment inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower or greater) that will be used in aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the contractor shall contact the PCAPCD before the new equipment being utilized. At least three business days before the use	Net SAP Area and PRSP Area	Placer County Planning Services Division and PCAPCD	With submittal of grading or improvement plans for construction	Satisfied with approval of grading or improvement plans for construction; submit equipment inventory before construction begins; contact PCAPCD before any new equipment is utilized; at least three business days before the use of subject heavy-duty off-road equipment, provide the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and on-site foreman; implement PCAPCD's recommended construction mitigation measure continuously during construction; ongoing monitoring

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
of subject heavy-duty off-road equipment, the project representative shall provide the PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and on-site foreman.				by ESD construction inspection during individual project construction
◢ With submittal of the equipment inventory, the contractor shall provide a written calculation for approval to PCAPCD demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project (i.e., owned, leased, and subcontractor vehicles), will achieve a project-wide fleet-average of 20 percent of NO_X and 45 percent of diesel PM reduction as compared to the CARB statewide fleet average emissions. Acceptable options for reducing emissions may include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The following link shall be used to calculate compliance with this condition and shall be submitted to the APCD as described above: http://www.airquality.org/businesses/ceqa-land-use-planning/mitigation (click on the current "Construction Mitigation Tool" spreadsheet under Step 1. If, due to increasingly stringent emissions standards and decreasing CARB statewide fleet average emissions, construction contractors cannot demonstrate the aforementioned emissions reductions, the following would apply. ◤ Incorporate all PCAPCD-recommended emission control measures available at the time of grading or improvement plan submittal, and comply with the State Off-Road Regulation by using diesel construction equipment meeting CARB's Tier 3 standard, or the highest tier available, for on-road and off-road heavy-duty diesel engines. Proof shall be submitted along with the written calculation of the emissions reduction achieved, incorporated additional measures, and engine model-year to be used for all equipment. Proof shall also include submittal of the CARB compliance certificate of the construction fleet to be used. <u>Dust Control Measures</u> Include the following standard notes on all Grading or Improvement Plans submitted for construction within the net SAP area or PRSP area: ◢ The contractor shall suspend all grading operations when fugitive dust exceeds PCAPCD Rule 228 Fugitive Dust limitations. Fugitive dust is not to exceed 40 percent opacity, nor go beyond the property boundary at any time. Lime or other drying agents utilized to dry out wet grading areas shall not exceed PCAPCD Rule 228 limitations.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ The contractor shall be responsible for keeping adjacent public thoroughfares clean of silt, dirt, mud, and debris, and shall "wet broom" the streets (or use another method to control dust as approved by the individual jurisdiction) if silt, dirt, mud or debris is carried over to adjacent public thoroughfares. (PCAPCD Rule 228) ◢ During construction activity, traffic speeds on all unpaved surfaces shall be limited to 15 miles per hour or less. (PCAPCD Rule 228) ◢ The contractor shall apply methods such as surface stabilization, the establishment of a vegetative cover, paving, (or use another method to control dust as approved by Placer County) to minimize wind-driven dust. ◢ The contractor shall apply water or use another method to control dust impacts offsite. Construction vehicles leaving the site shall be cleaned to prevent dust, silt, mud, and dirt from being released or tracked off-site. (PCAPCD Rule 228) ◢ The contractor shall suspend all grading operations when wind speeds (including instantaneous gusts) are excessive, and dust is impacting adjacent properties. (PCAPCD Rule 228) <u>Exhaust Control Measures</u> Include the following standard notes on Grading or Improvement Plans submitted for construction: ◢ The contractor shall ensure all construction equipment is maintained properly according to manufacturer's specifications. ◢ The contractor shall fuel all off-road and portable diesel-powered equipment with CARB-certified motor vehicle diesel fuel (non-taxed version suitable for off-road use). The contractor shall not discharge into the atmosphere volatile organic compounds (VOCs) caused by the use or manufacture of Cutback or Emulsified asphalts for paving, road construction or road maintenance unless such manufacture or use complies with the provisions of Rule 217. ◢ The contractor shall utilize existing power sources (e.g., power poles) or clean fuel (e.g., gasoline, biodiesel, natural gas) generators rather than temporary diesel power generators and use electrified equipment when feasible. ◢ During construction activity, no open burning of removed vegetation shall be allowed unless permitted by the District. All removed vegetative material shall be either chipped on site or taken to an appropriate recycling site, or if a site is not available, a licensed disposal site. (District Regulation 3)				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ The contractor shall minimize idling time to a maximum of 5 minutes for all diesel-powered equipment. (Placer County Code Chapter 10, Article 10.14; SAP Policy NR-7.14). ◢ Idling of construction-related equipment and construction-related vehicles is not permitted within 1,000 feet of any sensitive receptor (i.e., house, hospital, or school). ◢ Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. ◢ Construction equipment exhaust emissions shall not exceed PCAPCD Rule 202 Visible Emissions limitations. Operators of vehicles and equipment found to exceed opacity limits are to be immediately notified by the PCAPCD to cease operations, and the equipment must be repaired within 72 hours. (PCAPCD Rule 202) ◢ Operators of vehicles and equipment found to exceed opacity limits will be notified by the PCAPCD, and the equipment must be repaired within 72 hours. (PCAPCD Rule 228) ◢ Any device or process that discharges 2 pounds per day or more of air contaminants into the atmosphere, as defined by Health and Safety Code Section 39013, may require a PCAPCD permit. ◢ Developers/contractors should contact the PCAPCD before construction and obtain any necessary permits before the issuance of a Building Permit. (PCAPCD Rule 501) ◢ The contractor shall submit to the PCAPCD a comprehensive equipment inventory (e.g., make, model, year, emission rating) of all the heavy-duty off-road equipment (50 horsepower of greater) that will be used in aggregate of 40 or more hours for the construction project. If any new equipment is added after submission of the inventory, the contractor shall contact the PCAPCD before the new equipment being utilized. At least three business days before the use of subject heavy-duty off-road equipment, the project representative shall provide the PCAPCD with the anticipated construction timeline including start date, name, and phone number of the property owner, project manager, and on-site foreman. ◢ With submittal of the Dust Control Plan to the PCAPCD, the contractor shall provide a written calculation for approval to PCAPCD demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project (i.e., owned, leased, and subcontractor vehicles), will achieve a project-wide fleet-average of 20 percent of NO_X and 45 percent of diesel PM reduction as compared to the CARB statewide fleet average emissions. Acceptable options for reducing emissions may include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. If, because of increasingly stringent emissions standards and decreasing CARB statewide fleet average emissions, construction contractors cannot demonstrate the aforementioned emissions reductions, the following would apply.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.3-2b: Implement PCAPCD's recommended construction mitigation measures (Other Supporting Infrastructure) To ensure construction contractors for activities occurring outside of Placer County incorporate all available and feasible construction mitigation measures to reduce fugitive dust and exhaust emissions, Placer County shall coordinate with the City of Roseville to include specific requirements for dust suppression and exhaust emission reductions, as outlined above in Mitigation Measure 4.3-2a, as notes on Grading or Improvement Plans submitted for construction.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	With submittal of grading or improvement plans for construction	Satisfied with City approval of grading or improvement plans for construction; ongoing monitoring by City construction inspection during individual project construction
Mitigation Measure 4.3-3a: Reduce area-source emissions associated with land use development (Net SAP Area and PRSP Area) The County will require project proponents of development proposed under the project to incorporate the following measures to reduce area-source emissions to the extent feasible. <u>Transportation</u> ◢ All truck loading/unloading facilities shall be equipped with one 110/208-volt power outlet for every two dock doors or truck parking spaces. For the purpose of this mitigation measure, a truck loading/unloading facility is defined as any truck distribution yard, truck loading dock, or truck loading or unloading area where more than one truck with three or more axles will be present for more than 10 minutes per week, on average. A minimum 2-foot-by-3-foot sign shall be clearly visible at each loading dock that indicates, "Diesel engine idling limited to a maximum of 5 minutes." The sign shall include instructions for diesel trucks idling for more than 5 minutes to connect to the 110/208-volt power to run any auxiliary equipment. This measure is recommended in PCAPCD's *CEQA Handbook* (PCAPCD 2017a) and is also consistent with measure VT-1 in the California Air Pollution Control Officers Association (CAPCOA) guide (CAPCOA 2010:300–303). <u>Building Energy</u> ◢ Single family residential units constructed within the net SAP area and the PRSP area shall be designed to achieve a 30 percent reduction in energy use compared to a standard 2016 Title 24 code-compliant unit. Reductions in energy use shall be achieved by following the energy efficiency performance standards set forth in Tier 2 of the 2016 California Green Building Standards Code, Section A4.203.1.2.2. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential energy modeling software.	Net SAP Area and PRSP Area	Placer County Planning Services Division, ESD, and Building Department	With submittal of design review application, improvement plans, and/or building permits, as applicable	Satisfied with issuance of building permits; ongoing monitoring by County construction/building inspection during individual project construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Multi-family residential buildings of three stories or fewer constructed within the net SAP area and the PRSP area shall be designed to achieve a 15 percent reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy use shall be achieved by following the energy efficiency performance standards set forth in Tier 1 of the 2016 California Green Building Standards Code, Action A4.203.1.2.1. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential modeling software. ◢ Commercial buildings (including multi-family residential buildings four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy use shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use. ◢ All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2. ◢ All project buildings shall comply with requirements for water efficiency and conservation as described in the 2016 California Green Building Standards Code, Divisions 4.3 and 5.3. ◢ Multiple electrical receptacles shall be included on the exterior of all non-residential buildings and accessible for purposes of charging or powering electric landscaping equipment and providing an alternative to using fossil fuel-powered generators. The electrical receptacles shall have an electric potential of 100 volts. There should be a minimum of one electrical receptacle on each side of the building and one receptacle every 100 linear feet around the perimeter of the building. This measure is consistent with SAP Policy NR-6.6, which encourages installation of electric outlets to promote the use of electric landscape maintenance equipment. ◢ Energy Star®-certified appliances and fixtures shall be installed in all buildings developed under the project are if an Energy Star®-certified model of the application is available. Types of Energy Star®-certified appliances include boilers, ceiling fans, central and room air conditioners, clothes washers, compact fluorescent light bulbs, computer monitors, copiers, consumer electronics, dehumidifiers, dishwashers, external power adapters, furnaces, geothermal heat pumps, programmable thermostats, refrigerators and freezers, residential light fixtures, room air cleaners, transformers, televisions, vending machines, ventilating fans, and windows (EPA 2018c). If EPA's Energy Star® program is discontinued and not replaced with a comparable certification program before appliances and fixtures are selected, then similar measures which exceed the 2016 California Green Building Standards Code may be used.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ On-demand (tankless, instantaneous, or recirculating) hot water heaters shall be installed in all residential units and commercial areas that are not served by a central water boiler in the building. This measure is consistent with SAP Policy NR-6.7 that aims to improve building energy efficiency.				
Mitigation Measure 4.3-3b: Reduce mobile-source emissions (Net SAP Area and PRSP Area) Before Design Review approval, the project proponent shall include the following features (or features determined by the County to be equally or more effective at reducing mobile-source emissions) in finished buildings. These features shall be conditions of building permits: ◢ For each single-family residential unit, install a listed raceway, associated overcurrent protective device and the balance of a dedicated 208/240-volt branch circuit at 40 amperes (amp) minimum. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or unit subpanel and shall terminate into a listed cabinet, box, or other enclosure near the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible, or concealed areas and spaces. The service panel and/or subpanel shall provide capacity for a 40-amp minimum dedicated branch circuit. All electrical circuit components and Electric Vehicle Service Equipment (EVSE), including a receptacle or box with a blank cover, related to this section shall be installed in accordance with the California Electrical Code. ◢ Multi-family residential buildings shall design at least 10 percent of parking spaces to include EVSE or a minimum of two spaces to be installed with EVSE for buildings with 2-10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices. ◢ Non-residential buildings shall design at least 10 percent of parking spaces to include EVSE, or a minimum of two spaces to be installed with EVSE for buildings with 2-10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices. ◢ Non-residential land uses with 20 or more on-site parking spaces shall dedicate preferential parking spaces to vehicles with more than one occupant and ZEVs (including battery electric vehicles and hydrogen fuel cell vehicles). The number of dedicated spaces should be no less than two spaces or 5 percent of the total parking spaces on the individual project site, whichever is greater. These dedicated spaces shall be in preferential locations such as near the main entrances to the buildings served by the parking lot and/or under the shade of structures or trees. These spaces shall be clearly marked with signs and pavement markings.	Net SAP Area and PRSP Area	Placer County Planning Services Division, ESD, and Building Department	With submittal of design review application, improvement plans, and/or building permits, as applicable	Satisfied with issuance of building permits; ongoing monitoring by County construction/building inspection during individual project construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
This measure shall not be implemented in a way that prevents compliance with requirements in the California Vehicle Code regarding parking spaces for disabled persons or disabled veterans. ◢ Bicycle parking areas shall be provided near entrances to all nonresidential land uses, including retail, light industrial, office, hotel, entertainment, educational, and mixed-use buildings. This measure is consistent with SAP Policy NR-7.2 and TM-2.5 that encourage installation if bicycle-related facilities.				
Mitigation Measure 4.3-3c: Purchase ROG and NO_X offsets through PCAPCD's Off-Site Mitigation Fee Program (Net SAP Area and PRSP Area) After implementing on-site mitigation (identified in Mitigation Measures 4.3-3a and 4.3-3b, above), the net SAP area and PRSP area would still exceed the PCAPCD significance thresholds of 55 lb/day for ROG and NO_X. During the summer ozone season, ROG and NO_X emissions are estimated to exceed PCAPCD thresholds by 1,003 lb/day and 2,687 lb/day, respectively (equivalent to 339.48 tons per year of combined ROG and NO_X emissions) for the net SAP area and by 536 lb/day and 683 lb/day, respectively (equivalent to 112.15 tons per year of combined ROG and NO_X emissions) for the PRSP area. To mitigate the net SAP area and PRSP area long-term operational criteria pollutant emissions, the County will require project proponents of development proposed under the project to participate in one of the following off-site mitigation programs: ◢ Establish mitigation off-site within the west Placer County by participating in an off-site mitigation program, coordinated by PCAPCD. Examples include, but are not limited to: participation in a biomass program that provides emissions benefits; retrofitting, repowering, or replacing heavy-duty engines from mobile sources (e.g., buses, construction equipment, on road haulers); or other programs to reduce emissions. ◢ Participate in the District's Off-site Mitigation Fee Program by paying the equivalent amount of money, which is equal to the net SAP area's and PRSP area's contribution of pollutants (ROG and NO_X) that exceeds the 55 lb/day threshold for a one-year period. ◤ For the net SAP area, the total ROG and NO_X emission offset requirement is 339.5 tons. The estimated mitigation fee is $6,378,829 (equivalent to $0.86 per square foot for non-residential and $295 per residential unit), based upon PCAPCD's adopted cost-effectiveness of $18,790 per ton and current California Consumer Price Index rate. ◤ For the PRSP, the total combined ROG and NO_X emission offset requirement is 112.15 tons for a one-year period. The estimated mitigation fee is $2,107,261, equivalent to $295 per residential unit (based on a total of 7,146 units (PRSP: 5,636; University: 1,510). Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K. ◢ Any combination of the above measures, as determined feasible by PCAPCD.	Net SAP Area and PRSP Area	Placer County Planning Services Division and PCAPCD	At the time of recordation of each Small Lot Final Map	Satisfied at the time of recordation of each Small Lot Final Map

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.3-3d: Reduce PM_{10} emissions (Net SAP Area and PRSP Area) The County will require project proponents of development proposed under the project to incorporate the following measures to reduce PM_{10} emissions to the extent feasible. ◢ Wood-burning fireplaces and pellet appliances shall be prohibited in all residences. Only natural gas or propane-fired fireplace appliances would be permitted. These appliances shall be clearly delineated on the floor plans submitted in conjunction with the Building Permit application. This measure is consistent with SAP Policy NR-5.10 that aims to reduce particulate matter emissions from wood-burning appliances within Placer County. Where natural gas is available, gas outlets shall be provided in residential backyards for use with outdoor cooking appliances such as gas barbecues.	Net SAP Area and PRSP Area	Placer County Planning Services Division and PCAPCD	At the time of issuance of Building Permit	Satisfied with issuance of Building Permit
◢ Project proponents shall participate in an off-site mitigation project by paying the equivalent cost, equal to the net SAP area's and PRSP area's contribution of PM_{10} emissions that exceeds the 82-lb/day threshold for a period of one year, coordinated through Placer County and in consultation with the PCAPCD. Emission reductions achieved through the off-site mitigation program must be real and quantifiable, as determined by the County, PCAPCD, or a consultant selected by the County. Examples of an offset program include but are not limited to: participation in a biomass program that provides emission benefits; retrofitting, repowering, or replacing heavy-duty engines from mobile sources (e.g., replacing residential woodstoves, buses, construction equipment, on-road haul trucks); or other programs to reduce PM_{10} emissions. For the net SAP area, the total PM_{10} emission offset requirement is 199.7 tons. At the time of preparation of this EIR, the estimated mitigation fee for the net SAP area is $1,209,053.45 (equivalent to $0.16 per square foot for nonresidential uses and $77.51 per residential unit), based upon the current cost differential of $40 per bone dry ton of biomass waste removal. For the PRSP, the total PM_{10} emission offset requirement is 91.2 tons. At the time of preparation of this EIR, the estimated mitigation fee for the PRSP is $553,852.76, equivalent to $77.51 per dwelling unit (based on a total of 7,146 units (PRSP: 5,636; University: 1,510), and upon the current cost differential of $40 per bone dry ton of biomass waste removal. Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K. The actual amount to be paid shall be determined, based on the selected program and applicable cost effectiveness rate at the time of map recordation. This measure shall be satisfied prior to the recordation of each small lot map, or approval of the first building permit when a small lot map is not required.	Net SAP Area and PRSP Area	Placer County Planning Services Division and PCAPCD	At the time of recordation of each Small Lot Final Map	Satisfied at the time of recordation of each Small Lot Final Map

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.3-5a: Incorporation of design features to reduce health-risk exposure at sensitive receptors (Net SAP Area and PRSP Area) Prior to Design Review approval and/or issuance of grading permit, new development shall be designed so that truck loading/unloading facilities are not located within 1,000 feet of existing or planned sensitive receptors, if feasible considering site design parameters. Existing or previously approved industrial/commercial development, including any development within boundaries of existing industrial parks, are not subject to this mitigation measure. For the purpose of this mitigation measure, a truck loading/unloading facility is defined as any truck distribution yard, truck loading dock, or truck loading or unloading area where more than one truck with three or more axles will be present for more than 10 minutes per week, on average; and sensitive receptors include residential land uses, campus dormitories and student housing, residential care facilities, hospitals, schools, parks, playgrounds, or daycare facilities. A truck loading/unloading facility can be located within 1,000 feet of a sensitive receptor only if the project applicant prepares a qualified, site-specific HRA showing that the associated level of cancer risk at the sensitive receptors would not exceed 10 in 1 million. The HRA shall be conducted in accordance with guidance from PCAPCD and shall be approved by PCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. Design measures may include but are not limited to the following: ◢ Implement Mitigation Measure 4.3-3a, which requires all truck loading/unloading facilities to be equipped with one 110/208-volt power outlet for every two-truck loading/unloading facility. A minimum 2-foot-by-3-foot sign shall be clearly visible at each loading dock that indicates, "Diesel engine idling limited to a maximum of 5 minutes." The sign shall include instructions for diesel trucks idling for more than 5 minutes to connect to the 110/208-volt power to run any auxiliary equipment. This measure is recommended in PCAPCD's *CEQA Handbook* (PCAPCD 2017a) and is also consistent with measure VT-1 in the CAPCOA guide (CAPCOA 2010:300–303). ◢ The use of electric-powered "yard trucks" or fork lifts to move truck trailers around a truck yard or truck loading/unloading facility. ◢ The use of buildings or walls to shield commercial activity from nearby residences or other sensitive land uses. ◢ The use of EPA-rated Tier 4 Final engines in diesel-fueled construction equipment when construction activities are adjacent to existing sensitive receptors.	Net SAP Area and PRSP Area	Placer County Planning Services Division and PCAPCD	With submittal of Design Review application, tentative subdivision map submittal, and/or improvement plan submittal	Satisfied with approval of Design Review, tentative subdivision maps, improvement plans, building permit, and/or with construction inspections, as applicable

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Plant and maintain a vegetative buffer between the truck loading/unloading facility and nearby sensitive residences, schools, and daycare facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure. Applicants of residential or commercial development with new sensitive receptors proposed to be located within 1,000 feet of existing and/or planned commercial/industrial facilities that include, or may include, truck loading/unloading facilities, shall prepare an HRA as described above. Design measures identified in the HRA may include but are not limited to the following: ◢ Redesign the project to increase the distance between sensitive receptors and potential truck loading/unloading facilities; ◢ Use of upgraded filtration systems in the residential HVAC systems; ◢ Use of intervening buildings or walls to shield the receptors from the truck loading/unloading facility; ◢ Plant and maintain a vegetative buffer between sensitive receptors and the truck loading/unloading facilities. As part of detailed site design, a landscape architect licensed by the California Landscape Architects Technical Committee shall identify all locations where trees should be located, accounting for areas where shade is desired such as along pedestrian and bicycle routes, the locations of solar photovoltaic panels, and other infrastructure.				
Mitigation Measure 4.3-5b: Setback requirements for residential units near freeways (Net SAP Area) Before approval of tentative subdivision maps, project proponents shall demonstrate that residential developments are located at least 500 feet from any freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, as recommended by CARB, if feasible, considering site design parameters. New residences can be located within 500 feet of a new or existing freeway or urban road with traffic volumes that exceed 100,000 vehicles per day only if a project proponent prepares a qualified, site-specific HRA, approved by Placer County, showing that the associated level of cancer risk at the new residences would not exceed 10 in 1 million. The HRA shall be conducted in accordance with guidance from PCAPCD and approved by PCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. Design mitigation measures may include, but are not limited to the following:	Net SAP Area	Placer County Planning Services Division and PCAPCD	With submittal of Design Review application, improvements plans, and/or tentative subdivision maps	Satisfied with approval of Design Review, tentative subdivision maps, improvement plans, building permit, and/or with construction inspections, as applicable

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ install high-efficiency indoor air filters to filter particulates and other chemical matter from entering residences; ◢ plant and maintain vegetative barriers between new residences and SR 65; ◢ orient residential buildings away from SR 65; and ◢ design windows in residences to reduce PM exposure (e.g., windows nearest to the freeway do not open).				
Mitigation Measure 4.3-6a: Implement odor-reducing measures at the Western Regional Sanitary Landfill WPWMA developed a slate of odor reduction measures it estimates will reduce WRSL odors by up to 90 percent compared to the existing baseline and up to 50 percent compared to estimated odors in 2058, the projected year of landfill closure and conservative estimate of project buildout. Measures apply to composting operations, landfill operations, and site-wide technologies and operations. Capital costs and costs for ongoing operation and maintenance of the measures were also estimated. (See Technical Report #2, prepared by CE Schmidt and TR Card, dated August 2, 2019, and correspondence from Robin R. Baral, Churchwell White, LLP, on behalf of the Authority, to Clayton Cook, Placer County Counsel, dated August 22, 2019.) These measures, while not expressly proposed by WPWMA as the basis of a regional mitigation fee program, could logically serve that function. To develop a program, the Authority can and should take the additional steps to determine the type and geographic scope of fee program participants, the pro-rata share per given unit of development, and processes and procedures to administer the program. Based on information provided by WPWMA, the specific odor-reducing measures to be implemented under the program could include: ◢ **Implement Aerated Static Pile (ASP) Technology and Compost Best Management Practices (Tier 1, Composting Operations).** To reduce odors associated with composting operations, the greatest source of objectionable odors at WRSL, WPWMA can and should implement a revised composting methodology consisting of aerated static pile (ASP) technology in which air flow is induced through the material without turning or mixing. According to WPWMA, implementation of this measure is already planned for implementation. To ensure optimal odor reduction, best management practices (BMPs, e.g., anaerobic digestion of food waste) and training are also needed. ◢ **Conduct Annual Odor Emissions Testing and Implement Response Actions (Tier 1, Composting Operations).** To ensure maximum composting odor reduction, odor emissions testing is required on an annual basis to monitor odors and implement appropriate response is target reductions are not being achieved.	Net SAP Area and PRSP Area	Western Placer Waste Management Authority	None; timing dependent on Western Placer Waste Management Authority	None; timing dependent on Western Placer Waste Management Authority

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ **Construct and Operate a Mixing Building with Biofilter (Tier 1, Composting Operations).** To reduce odors associated with food waste composting, a mixing building fitted with a biofilter for air scrubbing should be constructed. The building would be a relatively small structure within which food waste would be received, blended with shredded green waste, then transferred to the ASP system where it would undergo controlled composting. ◢ **Apply Odor Neutralizers to Sorted Refuse (Tier 1, Landfill Operations).** To reduce landfill-related odor emissions, odor neutralizers should be applied to sorted refuse between transfer from the materials recovery facility (MRF) to the landfill site. This measure involves initial implementation of a spray system and ongoing application of neutralizer. ◢ **Apply Odor Neutralizers to Active Landfill Face and Implement BMPs (Tier 1, Landfill Operations).** To reduce landfill-related odor emissions, odor neutralizers should be applied to the active landfill face. Like that for sorted refuse, this measure involves initial implementation of a spray system and ongoing application of neutralizer. BMPs, such as limiting the size of the active landfill face, would optimize odor neutralizer operations. ◢ **Increase Screening of Landfill Gas and Implement Response Actions (Tier 1, Landfill Operations).** Quarterly screening for fugitive landfill gas should be conducted to identify "hot spots" of landfill gas emissions through interim and final landfill covers. Such screening would reduce the time between identification and repair of surface hot spot emissions, and thus odor. ◢ **Enhance Landfill Gas Collection (Tier 1, Landfill Operations).** To reduce landfill-related odor emissions, WPWMA should establish stricter protocols for landfill gas collection. Because landfill gas must be used, flared, or stored in a leak-free container, minimizing odorous emissions would involve operating the system for maximum containment of gas rather than maximum cost-effective performance of the gas-to-energy system. ◢ **Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies and Operations).** To monitor odor emissions in areas around the WRSL, odor sensors should be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the Authority's dispersion modeling capabilities should also be implemented to better predict the nature, location, and intensity of odor issues. ◢ **Establish Odor Hotline and Implement Community Outreach (Tier 1, Site-wide Technologies and Operations).** An odor hotline should be established to allow the public ready access to WPWMA staff who will receive community complaints and concerns, and to provide timely response actions.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ **Establish Tree-lined Perimeter of WRSL (Tier 1, Site-wide Technologies and Operations).** Trees with aromatic foliage, such as pine or eucalyptus, should be planted around WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility. ◢ **Implement Compost Curing Controls (Tier 2, Composting Operations).** To further reduce compost-related odor emissions, ASP techniques, described above for raw compost, can and should be used on cured compost. ◢ **Improve Pond Aeration (Tier 2, Composting Operations).** Leachate collected from composting activities is rich in organic compounds and therefore odorous, especially in anaerobic conditions. To further reduce odor emissions from the ponds, leachate should be aerated to increase aerobic digestion of organic compounds and reduce fugitive odors. ◢ **Implement Monthly Odor Testing and Response Actions (Tier 2, Composting Operations).** Monthly odor testing should be implemented to ensure odor reduction measures for active and cured compost are functioning as expected and to implement corrective actions as needed. ◢ **Apply Posi-Shell Landfill Cover (Tier 2, Landfill Operations).** Posi-Shell is an enhanced form of landfill cover that uses a blend of clay, fibers, and polymers to produce a spray-applied mortar that dries in the form of a thin durable stucco. Posi-Shell, or similar membrane cover, should be applied to reduce landfill-related odor emissions. ◢ **Implement Continuous Cover on Active Landfill Face (Tier 2, Landfill Operations).** Odor-neutralizing foam or similar product should be used on the active landfill face during fill operations to reduce landfill-related odor emissions. ◢ **Conduct Additional Landfill Gas Monitoring and Implement Response Actions (Tier 2, Landfill Operations).** Additional monitoring should be conducted to ensure that landfill gas leaks and emissions are not occurring in the above-ground system during gas collection and response actions implemented to correct such leaks if they are discovered.				
Mitigation Measure 4.3-6b: Require fair-share contribution to WPWMA for odor mitigation As described in the Draft EIR at pages 4.3-6 through 4.3-11, objectionable odors are currently generated at WPWMA facilities, odor complaints are regularly lodged, and odors are an existing issue. It would be neither feasible nor reasonable for all odor mitigation costs to be borne by the proposed project. Therefore, based on the Authority-proposed measures, their costs, and a reasonable methodology to determine a fair-share contribution, Placer County shall require the proponents of the Placer Ranch Specific Plan to contribute a total payment of $2,465,273 to the Western Placer Waste Management Authority for purposes of funding odor reduction measures that will reduce odor impacts resulting from development within the Placer Ranch Specific Plan area.	Net SAP Area and PRSP Area	Placer County Planning Services Division in coordination with Western Placer Waste Management Authority	With submittal of first improvement plans or small lot tentative map	Satisfied with approval of first improvement plans or recordation of small lot tentative map

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
The payment required of Placer Ranch Specific Plan proponents is based on: (1) the cost of non-Authority-funded Tier 1 odor control measures, apportioned by the number of residential units that could be developed in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary, and (2) a fair-share proportion of annual maintenance costs converted to present value over a 30-year absorption period, also apportioned by non-university residential units. Because odors are an existing issue, and because the entire project (PRSP and net SAP) would conservatively generate approximately 16 percent of odorous emissions compared to baseline conditions and 8 percent of odorous emissions in 2058 (estimated year of landfill closure and conservative estimate of project buildout), the proposed contribution for both capital expenditures and maintenance costs is considered conservative, that is, it more than compensates for the impact of the project. Costs include $2,172,513 in capital investment, plus approximately $290,000 for a one-time, good-faith contribution to operation and maintenance costs of the measures over a 20-year period. (The details and assumptions involved in the calculation of capital funding are described in greater detail in Master Response 4: Odors of the Final EIR.) In addition to the fair-share contribution for odor mitigation required of PRSP, Placer County will require fair-share contribution by other future residential developments proposed in the net SAP area in the zone between 2,000 feet and 1 mile of the landfill, measured from the landfill property boundary. Based on the Authority's comprehensive assessment of odor control measures, their efficacy, and costs, it is expected that WPWMA can and should develop a bona fide regional fee program to which proponents of regional development projects will contribute to implement, operate, and maintain odor control measures.				
4.4 Biological Resources				
Mitigation Measure 4.4-1a: Compensate for loss of aquatic resources (Net SAP and PRSP) Consistent with proposed SAP Policy NR-1.2, Stream System Protection, the County shall require the protection and enhancement of the Stream System and other areas capable of meeting the PCCP Reserve Acquisition and avoidance criteria (e.g. Stream System, avoided areas 200 acres or greater, habitat and wetlands adjacent or connected to the Stream System or existing/future Reserves, Valley Oak Woodlands one acre or greater). Consistent with proposed SAP Program NR-4, PCCP and CARP Program Consistency, the County shall require project applicants to delineate all aquatic resources, implement all feasible avoidance and minimization measures described in the PCCP and CARP, calculate the extent of impacts, and provide compensatory mitigation according to the procedures described in the adopted PCCP and CARP, through payment of applicable mitigation fees to the In-Lieu Fee Program or purchase of mitigation credits at an agency-approved mitigation bank. If adopted, the PCCP may allow for consideration	Net SAP Area and PRSP Area	Placer County Planning Services Division	With submittal of improvement plans or at time of design review	Satisfied upon approval of improvement plans or with design review

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
of land dedication in-lieu of PCCP fees, subject to approval by the future Placer Conservation Authority (PCA) and concurrence by the state and federal agencies. The fees collected through the In-Lieu Fee Program shall be used to fund land acquisition, mitigation projects that protect, enhance, and restore aquatic resources, and long-term management and monitoring within the PCCP Reserve Acquisition Areas.				
If the PCCP, including the Western Placer CARP and associated USACE programmatic permits are not adopted, or are not available as a permitting and mitigation strategy for future projects, compensation for loss of aquatic resources shall be implemented as follows: ◢ As a condition of project approval, the County shall require project proponents to conduct a delineation of waters of the United States according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and Arid West Supplement (Environmental Laboratory 2008) and to delineate any aquatic resources that may not meet the definition of waters of the United States, but would qualify as waters of the state. The delineation shall map and quantify the acreage of all aquatic resources on the project site and associated off-site improvement areas and shall be submitted to USACE for jurisdictional determination. This requirement applies to project sites for which a current delineation and subsequent verification and concurrence by USACE have not been completed.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Prior to project approval	Satisfied prior to project approval
◢ A permit from the USACE will be required for any activity resulting in fill of wetlands and other waters of the United States. Project proponents shall be required to obtain this permit before project initiation. A wetland mitigation plan that satisfies USACE requirements will be needed as part of the permit application. Project proponents that obtain a Section 404 permit will also be required to obtain water quality certification from the Central Valley RWQCB pursuant to Section 401 of the CWA.	Net SAP Area and PRSP Area	Placer County Planning Services Division, USACE, and Central Valley RWQCB	Prior to improvement plan approval/construction start	Satisfied prior to improvement plan approval/construction start
◢ The project proponent for each future project requiring fill of aquatic resources shall replace or restore on a "no-net-loss" basis the function of all wetlands and other waters that would be removed as a result of implementing the respective project. Wetland habitat will be restored or replaced at an acreage and location and by methods agreeable to USACE and the Central Valley RWQCB, depending on agency jurisdiction, and as determined during the Section 401 and Section 404 permitting processes.	Net SAP Area and PRSP Area	Placer County Planning Services Division, USACE, and Central Valley RWQCB	Prior to improvement plan approval/construction start	Satisfied prior to improvement plan approval/construction start

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ The project proponent shall submit a compensatory mitigation and monitoring plan (MMP) to USACE and the Central Valley RWQCB, for review and approval before USACE making a permit decision for the proposed action. The MMP shall be consistent with the Final 2015 Regional Compensatory Mitigation and Monitoring Guidelines for South Pacific Division USACE, or most current guidelines, and shall identify the amount and type of proposed compensatory mitigation to ensure "no net loss" of aquatic resource functions and services that would be removed, lost, and/or substantially degraded as a result of implementing the project. The MMP will describe compensation ratios for acres filled, mitigation sites and work plan, maintenance plan and long-term management plan, a monitoring protocol, annual performance standards and final success criteria for created or restored habitats, corrective measures to be applied if performance standards are not met, legal protection for the preservation and mitigation areas (e.g., conservation easement, declaration of restrictions), and funding mechanism information (e.g., endowment). ◢ Mitigation methods may consist of establishment by a qualified biologist of aquatic resources in upland habitats where they did not exist previously, reestablishment (restoration) of natural historic functions to a former aquatic resource, enhancement of an existing aquatic resource to heighten, intensify, or improve aquatic resource functions, or a combination thereof. The compensatory mitigation may be accomplished through purchase of credits from a USACE-approved mitigation bank, payment into a USACE-approved in-lieu fee fund, or through permittee-responsible on-site or off-site establishment, reestablishment, or enhancement, depending on availability of mitigation credits. To the extent practicable, mitigation shall be carried out within the affected watershed.	Net SAP Area and PRSP Area	Placer County Planning Services Division, USACE, and Central Valley RWQCB	Submit compensatory MMP to USACE and the Central Valley RWQCB before USACE makes a permit decision for the proposed action	Satisfied with submittal of compensatory MMP to USACE and the Central Valley RWQCB
◢ Permittee-responsible mitigation habitat shall be monitored by a qualified biologist for a minimum of 5 years from completion of mitigation, or human intervention (including recontouring and grading), or until the success criteria identified in the approved MMP have been met, whichever is longer.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Begin monitoring at completion of mitigation	Continue monitoring for a minimum of 5 years from completion of mitigation, or human intervention (including recontouring and grading), or until the success criteria identified in the approved MMP have been met, whichever is longer

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.4-1b. Coordinate with City of Roseville regarding mitigation for loss of aquatic resources resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for loss of aquatic resources resulting from construction of the Pleasant Grove Retention Facility and other off-site improvements within the City's jurisdiction. As a part of its CEQA process for each improvement project, the City of Roseville, as lead agency, would identify and implement appropriate mitigation for significant impacts to aquatic resources. The City would also obtain permits pursuant to Sections 404 and 401 of the Clean Water Act for fill of waters of the United States, including wetlands. As part of the permitting process, the City would identify and implement mitigation resulting in no net loss of wetland functions and values. Placer County would play a coordinating role but would have no control over the timing and implementation of mitigation for off-site improvements that occur within the City of Roseville.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for each improvement project	Satisfied prior to City construction project commencing
Mitigation Measure 4.4-2: Coordinate with City of Roseville regarding mitigation for impacts on special-status plant species resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for loss of special-status plants resulting from construction of the Pleasant Grove Retention Facility and off-site transportation and utility improvements within the City's jurisdiction. As a part of its CEQA process for each improvement project, the City of Roseville, as lead agency, would identify and implement appropriate mitigation for significant impacts on special-status plants. Placer County would play a coordinating role but would have no control over the timing and implementation of mitigation for off-site improvements that occur within the City of Roseville.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for each improvement project	Satisfied prior to City construction project commencing
Mitigation Measure 4.4-3a: Minimize take of western spadefoot (Net SAP and PRSP) As a condition of project approval and before ground disturbing activities, the County shall require future project proponents to retain a qualified biologist to determine if the project site contains suitable habitat for western spadefoot and if so, conduct surveys for western spadefoot in areas of potential habitat that would be eliminated by the project. The surveys shall be conducted at the appropriate time of year to detect western spadefoot, generally the breeding season, according to methods approved by CDFW. If western spadefoot is found in habitat that will be eliminated or made unsuitable for western spadefoot, then a plan to collect and relocate adult and larval western spadefoot and egg masses to suitable habitat that will be preserved in perpetuity as required by Mitigation Measure 4.4-3b below.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before submittal of design review application or improvement plans	Satisfied prior to ground disturbing activities

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.4-3b: Compensate for take of federally listed vernal pool invertebrates and western spadefoot habitat loss (Net SAP and PRSP) Loss of vernal pool habitat and other seasonal wetland habitats that support or potentially support Federally listed vernal pool invertebrates shall be replaced or restored in such a manner that there will be no net loss of habitat (acreage and function) for vernal pool invertebrates and western spadefoot following project implementation. As described under Mitigation Measure 4.4-1a, project proponents shall complete and implement a compensatory habitat MMP describing how loss of vernal pool and other wetland habitats shall be offset, including details for creating habitat; accounting for the temporal loss of habitat, performance standards to ensure success, and remedial actions to be implemented if performance standards are not met. All measures shall meet the approval of Placer County, USACE, and USFWS.	Net SAP Area and PRSP Area	See Mitigation Measure 4.4-1a, above	See Mitigation Measure 4.4-1a, above	See Mitigation Measure 4.4-1a, above
No project construction shall proceed in areas supporting potential habitat for Federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS), until a biological opinion (BO) and incidental take authorization has been issued by USFWS and the project proponent has abided by conditions in the BO, including all conservation and minimization measures. Conservation and minimization measures shall include preparation of supporting documentation describing methods to protect existing vernal pools during and after project construction, a detailed monitoring plan, and reporting requirements.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before project construction begins in areas supporting potential habitat for Federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS)	Satisfied before project construction begins in areas supporting potential habitat for Federally listed vernal pool invertebrates, or within adequate buffer areas (250 feet or lesser distance deemed sufficiently protective by a qualified biologist with approval from USFWS)
Western spadefoot also requires the protection of vernal pool habitat for survival; therefore, implementation of Mitigation Measures 4.4-3a and 4.4-3b would also reduce impacts to western spadefoot. Mitigation shall include preservation of in-kind wetland habitats within the Western Placer County core area at ratios satisfactory to ensure no net loss of habitat acreage, function, and value within the core area. To count toward preservation credits, vernal pool habitats within the open space areas shall be placed under a permanent conservation easement. Habitat to be protected includes both occupied and unoccupied suitable habitat that serves as corridors for dispersal, opportunities for metapopulation dynamics, reintroduction/introduction sites, and protection of undiscovered populations. Mitigation may include a combination of on-site and off-site preservation, as well as on-site or off-site wetland restoration and creation, purchase of credits at a mitigation bank approved by USFWS and USACE, or in-lieu fee mitigation.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
The project proponents shall preserve acreage of vernal pool habitat for each wetted acre of any indirectly affected vernal pool habitat at a ratio approved by USFWS at the conclusion of the Section 7 consultation. This mitigation shall occur before the approval of any grading or improvement plans for any project or phase that would allow work within 250 feet of such habitat, and before any ground-disturbing activity within 250 feet of the habitat. The project proponents will not be required to complete this mitigation measure for direct or indirect impacts that have already been mitigated to the satisfaction of USFWS through another BO or MMP, such as a BO obtained for the Placer Parkway or for Pleasant Grove Retention Facility.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before the approval of any grading permits, grading plans, or improvement plans for any project or phase that would allow work within 250 feet of vernal pool habitat, and before any ground-disturbing activity within 250 feet of the habitat	Satisfied before the approval of any grading permits, grading plans, or improvement plans for any project or phase that would allow work within 250 feet of vernal pool habitat, and before any ground-disturbing activity within 250 feet of the habitat
Mitigation Measure 4.4-3c: Coordinate with City of Roseville regarding mitigation for vernal pool fairy shrimp, vernal pool tadpole shrimp and western spadefoot impacts resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for impacts on vernal pool branchiopods and western spadefoot from construction of the Pleasant Grove Retention Facility and other off-site improvements within the City's jurisdiction. As a part of its CEQA process for each improvement project, the City of Roseville, as lead agency, would identify and implement appropriate mitigation for significant impacts to vernal pool branchiopods and western spadefoot. Likewise, as a condition of project approval, the City of Roseville or applicant for off-site improvements would be required to obtain permits from USACE for fill of wetlands, which would trigger consultation with USFWS for species listed under the Endangered Species Act, including vernal pool fairy shrimp and vernal pool tadpole shrimp. Through the consultation process, measures to avoid, minimize, or compensate for impacts to listed species would be required. Placer County would play a coordinating role but would have no control over the timing and implementation of mitigation for off-site improvements within the City of Roseville, nor would it have authority to enforce consultation with USFWS or permit compliance for off-site improvements that occur outside its own jurisdiction.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for each improvement project	Satisfied with City of Roseville's issuance of CEQA NOD for each improvement project
Mitigation Measure 4.4-4a: Avoid or compensate for valley elderberry longhorn beetle habitat (Net SAP and PRSP) ◢ Valley elderberry longhorn beetle is proposed as a covered species under the PCCP. If the PCCP has been adopted before implementation of the net SAP and PRSP, potential impacts to this species shall be mitigated through implementation of the PCCP conservation strategy. The PCCP conservation strategy includes survey and impact minimization/avoidance requirements for covered species, other conditions on covered activities to achieve conservation goals and objectives for covered species and natural communities, establishment of a habitat reserve system, and long-term conservation and management of habitats in the reserve system.	Net SAP Area and PRSP Area	Placer County Planning Services Division	With submittal of improvement plans or with design review application	Satisfied upon payment of PCCP fees and completion of PCCP-required avoidance and minimization measures

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ If the PCCP has not been adopted before implementation of the net SAP and PRSP, project proponents under the PRSP and Net SAP shall be required to implement the following measures to mitigate potential impacts on valley elderberry longhorn beetle:	Net SAP Area and PRSP Area	Placer County Planning Services Division	Surveys completed prior to construction activities in any riverine/riparian habitat located within 165 feet of project disturbance areas; minimization measures implemented, as necessary, during construction	Implement avoidance and minimization measures continuously during construction, per the USFWS 2017 Framework
◤ As a condition of approval, a qualified biologist shall determine whether future project sites contain valley elderberry longhorn beetle habitat (i.e., elderberry shrubs). If so, a preconstruction survey shall be conducted by a qualified biologist in all riverine/riparian habitat within 165 feet of project disturbance areas before any construction activity. The surveys shall be conducted according to the protocol outlined in USFWS *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle* (USFWS 2017c) (Framework). ◤ If elderberry shrubs are not present, no further mitigation is necessary. ◤ If elderberry shrubs are located 165 feet or more from project activities, direct or indirect impacts are not expected. Shrubs shall be protected during construction by establishing and maintaining a high visibility fence at least 165 feet from the drip line of each elderberry shrub. ◤ If elderberry shrubs can be retained within the project footprint, project activities may occur up to 20 feet from the dripline of elderberry shrubs if precautions are implemented to minimize the potential for indirect impacts. An avoidance area shall be established at least 20 feet from the drip line of an elderberry shrub for any activities that may damage the elderberry shrub (e.g., trenching, paving, etc.). The project proponent will implement avoidance and minimization measures specified in the USFWS *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle* (USFWS 2017c). ◤ As much as feasible, all activities that could occur within 165 feet of an elderberry shrub, shall be conducted outside of the flight season of the valley elderberry longhorn beetle (March - July). ◤ Herbicides shall not be used within the drip line of the shrub. Insecticides shall not be used within 100 feet of an elderberry shrub. All chemicals shall be applied using a backpack sprayer or similar direct application method. ◤ Mechanical weed removal within the drip-line of the shrub shall be limited to the season when adults are not active (August - February) and shall avoid damaging the elderberry. ◤ If any elderberry shrubs cannot be avoided according to the USFWS 2017 Framework, the project proponent shall compensate for the loss of valley elderberry longhorn beetle habitat through participation in the PCCP, if it has been adopted and is available for project participation.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◤ If trimming elderberry shrubs is proposed, trimming shall be conducted between November and February and shall not result in the removal of elderberry branches that are ≥1 inch in diameter. If trimming results in removing branches that are ≥1 inch in diameter, the project proponent shall mitigate for the loss of the valley elderberry beetle habitat through participation in the PCCP, if adopted, or according to the USFWS 2017 Framework if the PCCP has not been adopted.				
◢ The project proponent shall comply with ESA and consult with USFWS and will compensate for the unavoidable loss of elderberry shrubs according to USFWS 2017 Framework. The Framework uses presence or absence of exit holes, and whether the affected elderberry shrubs are in riparian habitat to determine the number of elderberry seedlings or cuttings and associated riparian vegetation that would need to be planted as compensatory mitigation for affected valley elderberry longhorn beetle habitat. Compensatory mitigation may include purchasing credits at a USFWS-approved conservation bank, providing on-site mitigation, or establishing and protecting habitat for valley elderberry longhorn beetle as follows: ◤ For elderberry shrubs in riparian habitat: – For each shrub that is trimmed, the project proponent shall purchase two credits at a USFWS-approved bank. – For each shrub that is removed, the entire shrub may be transplanted to a USFWS-approved location in addition to the purchase of two credits. ◤ For elderberry shrubs in non-riparian habitat: – The project proponent shall purchase one credit at a USFWS-approved bank for each shrub that will be trimmed if exit holes have been found in any shrub on or within 165 feet of the project area. – If no exit holes are present and the shrub is not in riparian habitat, no further action is required. – If the shrub will be completely removed by the activity, the entire shrub shall be transplanted to a USFWS-approved location in addition to a purchase of one credit.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Compensation and/or transplanting implemented prior to initiating construction within 165 feet of an area that contains elderberry shrubs	Compensation and/or transplanting implemented prior to initiating construction within 165 feet of an area that contains elderberry shrubs

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.4-4b: Coordinate with City of Roseville regarding mitigation for impacts on valley elderberry longhorn beetle resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for impacts on valley elderberry longhorn beetle from construction of the Pleasant Grove Retention Facility and other off-site improvements within the City's jurisdiction. As a part of its CEQA process for each improvement project, the City of Roseville, as lead agency, would identify and implement appropriate mitigation for significant impacts on valley elderberry longhorn beetle. Likewise, as a condition of project approval, the City of Roseville or applicant for off-site improvements would be required to obtain take authorization from USFWS for species listed under the Endangered Species Act, including valley elderberry longhorn beetle. Through the consultation process, measures to avoid, minimize, or compensate for impacts to valley elderberry longhorn beetle would be required. Placer County would play a coordinating role but would have no control over the timing and implementation of mitigation for off-site improvements within the City of Roseville, nor would it have authority to enforce consultation with USFWS or permit compliance for off-site improvements that occur outside its own jurisdiction.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for each improvement project	Satisfied with City of Roseville's issuance of CEQA NOD for each improvement project
Mitigation Measure 4.4-5a: Minimize and avoid disturbances to western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird; compensate for loss of occupied habitats (Net SAP Area and PRSP Area) ◢ Western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird are proposed as covered species under the PCCP. If the PCCP has been adopted before implementation of the SAP and PRSP, potential impacts to these covered species shall be mitigated through implementation of the PCCP conservation strategy. The PCCP conservation strategy includes survey and impact minimization/avoidance requirements for covered species, other conditions on covered activities to achieve conservation goals and objectives for covered species and natural communities, establishment of a habitat reserve system, and long-term conservation and management of habitats in the reserve system.	Net SAP Area and PRSP Area	Placer County Planning Services Division	With submittal of improvement plans or with design review application	Satisfied upon payment of PCCP fees and completion of PCCP-required avoidance and minimization measures
◢ If the PCCP has not been adopted before implementation of the SAP and PRSP, the following measures shall be implemented for potential impacts to western pond turtle, burrowing owl, Swainson's hawk, and tricolored blackbird. <u>Western Pond Turtle</u> Before ground disturbing activities, project proponents shall retain a qualified biologist to determine whether the potential project site contains suitable habitat for western pond turtle. For projects or ground-disturbing activities (including any required off-site improvements) with potential to disturb suitable aquatic or adjacent upland habitat for western pond turtle, the following measures shall be implemented.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before ground disturbing activities with potential to disturb suitable aquatic or adjacent upland habitat for western pond turtle	Conduct western pond turtle survey within 24 hours before beginning construction activities within 300 feet of suitable aquatic habitat; re-inspect construction area whenever a lapse in construction activity of two weeks or more has occurred

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Within 24 hours before beginning construction activities within 300 feet of suitable aquatic habitat for western pond turtle, a qualified biologist shall survey areas of anticipated disturbance for the presence of western pond turtle, including eggs and hatchlings. The construction area shall be re-inspected whenever a lapse in construction activity of two weeks or more has occurred. If pond turtles or their eggs are found during the survey or observed within the construction area at any other time, they shall be relocated by a qualified biologist, outside of the area of disturbance, to the nearest area of suitable aquatic habitat of equal or better quality as the affected habitat. CDFW will be notified of the discovery and relocation of any western pond turtles.				
◢ If western pond turtle nests are found in the disturbance area during preconstruction surveys, a 300-foot no disturbance buffer shall be established between the nest and any areas of potential disturbance. Buffers shall be clearly marked with temporary fencing. Construction will not be allowed to commence in the exclusion area until hatchlings have emerged from the nest, or the nest is deemed inactive by a qualified biologist. When hatchlings emerge from the nest, they shall be relocated by a qualified biologist to suitable aquatic habitat outside of the area of disturbance.	Net SAP Area and PRSP Area	Placer County Planning Services Division	During preconstruction surveys	Continuously during preconstruction surveys, before construction commences, and during construction
<u>Burrowing Owl</u> Before ground disturbing activities, project proponents shall retain a qualified biologist to determine whether the project site could affect suitable habitat for burrowing owl. For projects or ground-disturbing activities with potential to disturb suitable habitat for burrowing owl, the following measures shall be implemented. ◢ The project proponent shall retain a qualified biologist to conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of suitable habitat on and within 1,500 feet of the project site and any required off-site improvements. Surveys shall be conducted before the start of construction activities and in accordance with Appendix D of CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) or the most recent CDFW protocols.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before ground disturbing activities with potential to disturb suitable habitat for burrowing owl	Satisfied prior to ground disturbing activities with potential to disturb suitable habitat for burrowing owl
◢ If no occupied burrows are found, a letter report documenting the survey methods and results shall be submitted to CDFW and no further mitigation will be required.				
◢ If an active burrow is found during the nonbreeding season (September 1 through January 31), the project proponent shall consult with CDFW regarding protection buffers to be established around the occupied burrow and maintained throughout construction. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan shall be developed, as described in Appendix E of CDFW's 2012 Staff Report. Burrowing owls shall not be excluded from occupied burrows until the project's burrowing owl exclusion plan is approved by CDFW. The exclusion plan shall include a plan for creation, maintenance, and monitoring of artificial burrows in suitable habitat proximate to the burrows to be destroyed, that provide substitute burrows for displaced owls.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before ground disturbing activities with potential to disturb suitable habitat for burrowing owl	Establish and maintain protection buffers around occupied burrows throughout construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows shall not be disturbed and will be provided with a 150- to 1,500-foot protective buffer unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer shall depend on the time of year and level disturbance as outlined in the CDFW Staff Report (CDFG 2012) or the most recent CDFW protocols. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented to ensure burrowing owls are not detrimentally affected. Once the fledglings are capable of independent survival, the owls can be evicted and the burrow can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW's 2012 Staff Report or the most recent CDFW protocols. ◢ If active burrowing owl nests are found on the site and are destroyed by project implementation, the project proponent shall mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW 2012 Staff Report or the most recent CDFW protocols, which states that permanent impacts to nesting, occupied and satellite burrows, and burrowing owl habitat shall be mitigated such that habitat acreage, number of burrows, and burrowing owls impacted are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. The project proponent shall retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards: ◤ Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species range wide. ◤ If feasible, mitigation lands shall be provided adjacent or proximate to the site so that displaced owls can relocate with reduced risk of take. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient suitable habitat to support displaced owls that may be preserved in perpetuity. ◤ If suitable habitat is not available for conservation adjacent or proximate to the project site, mitigation lands shall be focused on consolidating and enlarging conservation areas outside of urban and planned growth areas and within foraging distance of other conservation lands. Mitigation may be accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. If mitigation credits are not available from an approved bank and mitigation lands are not available adjacent to other conservation lands, alternative mitigation sites and acreage shall be determined in consultation with CDFW.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
▼ If mitigation is not available through an approved mitigation bank and will be completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.				
<u>Swainson's Hawk</u> Project proponents shall retain a qualified biologist to determine whether the potential project site contains suitable habitat for Swainson's hawk. For projects or ground-disturbing activities (including any required off-site improvements) with potential to affect Swainson's hawk and other raptor nests, or remove Swainson's hawk foraging habitat, the project proponent shall consult with CDFW with respect to the following measures proposed to mitigate for habitat removal and potential nest disturbance. As part of the consultation, the project proponent may seek take authorization under Section 2081 of the Fish and Game Code. The following measures will be implemented and are intended to avoid, minimize, and fully mitigate impacts to Swainson's hawk, as well as other raptors: ◢ For construction activities that would occur within 0.25 mile of a known or likely Swainson's hawk nest site (identified based on previous years' use by Swainson's hawk), the project proponent shall attempt to initiate construction activities before nest initiation phase (i.e., before March 1). Depending on the timing, regularity, and intensity of construction activity, construction in the area before nest initiation may discourage a Swainson's hawk pair from using that site and eliminate the need to implement further nest-protection measures, such as buffers and limited construction operating periods around active nests. Other measures to deter establishment of nests (e.g., reflective striping or decoys) may be used before the breeding season in areas planned for active construction. However, if breeding raptors establish an active nest site, as evidenced by nest building, egg laying, incubation, or other nesting behavior, near the construction area, they shall not be harassed or deterred from continuing with their normal breeding activities.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before ground disturbing activities with potential to affect Swainson's hawk and other raptor nests, or remove Swainson's hawk foraging habitat	Initiate construction activities before nest initiation phase (i.e., before March 1); conduct preconstruction surveys for Swainson's hawk and other nesting raptors before the beginning of any construction activities between March 1 and September 15; establish appropriate buffers around active nest sites; monitor nest during and after construction activities (if required)

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ For project activities, including tree removal, that begin between March 1 and September 15, qualified biologists shall conduct preconstruction surveys for Swainson's hawk and other nesting raptors and to identify active nests on and within 0.5 mile of the project site. The surveys shall be conducted before the beginning of any construction activities between March 1 and September 15, following the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee 2000). ◢ Impacts to nesting Swainson's hawks and other raptors shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction raptor surveys. Project activity shall not commence within the buffer areas until a qualified biologist has determined, in coordination with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. CDFW guidelines recommend implementation of 0.25-mile-wide buffer for Swainson's hawk and 500-feet for other raptors, but the size of the buffer may be adjusted if a qualified biologist and the project proponent, in consultation with CDFW, determine that such an adjustment would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest. ◢ Trees shall not be removed during the breeding season for nesting raptors unless a survey by a qualified biologist verifies that there is not an active nest in the tree. ◢ To mitigate for permanent losses of Swainson's hawk foraging habitat, the project proponent will provide foraging habitat compensation at a 1:1 ratio (i.e., one acre of compensatory habitat for each acre developed). This compensation may be achieved through one or more approaches, including providing replacement habitat through fee title or conservation easement, or purchase of credits in a CDFW-approved Swainson's hawk conservation bank.				
<u>Tricolored Blackbird</u> Project proponents shall retain a qualified biologist to determine whether suitable habitat for tricolored blackbird is present on or within 500 feet of the project site. For projects or ground-disturbing activities that could affect tricolored blackbird nesting habitat, the following measures shall be implemented to avoid or minimize loss of active tricolored blackbird nests: ◢ To minimize the potential for loss of tricolored blackbird nesting colonies and other nesting birds, vegetation removal activities shall commence during the nonbreeding season (September 1-January 31) to the extent feasible. If all suitable nesting habitat is removed during the nonbreeding season, no further mitigation would be required.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before ground disturbing activities that could affect tricolored blackbird nesting habitat	Commence vegetation removal activities during the nonbreeding season (September 1-January 31); conduct preconstruction surveys for nesting tricolored blackbirds (colonies) no more than 14 days before construction commences; monitor occupied nests during construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Before removal of any vegetation within potential nesting habitat between February 1 and August 31, a qualified biologist shall conduct preconstruction surveys for nesting tricolored blackbirds (colonies). The surveys shall be conducted no more than 14 days before construction commences. If no active nests or tricolored blackbird colonies are found during focused surveys, no further action under this measure will be required. If active nests are located during the preconstruction surveys, the biologist shall notify CDFW. If necessary, modifications to the project design to avoid removal of occupied habitat while still achieving project objectives shall be evaluated, and implemented to the extent feasible. If avoidance is not feasible or conflicts with project objectives, construction shall be prohibited within a minimum of 100 feet of the nest to avoid disturbance until the nest colony is no longer active. These recommended buffer areas may be reduced or expanded through consultation with CDFW. Monitoring of all occupied nests shall be conducted by a qualified biologist during construction activities to adjust the 100-foot buffer if agitated behavior by the nesting bird is observed.				
Mitigation Measure 4.4-5b: Protect northern harrier, white-tailed kite, and other nesting raptor nests (Net SAP Area and PRSP Area) For projects or ground-disturbing activities (including any required off-site improvements) with potential to affect northern harrier, white-tailed kite, or other raptor nests (i.e., activities proposed to occur in or within 500 feet of suitable habitat), the project proponent shall implement the following preconstruction survey and nest avoidance measures. ◢ For project activities, including tree and other vegetation removal, that begin between February 1 and September 15, qualified biologists shall conduct preconstruction surveys for white-tailed kite and northern harrier and to identify active nests on and within 500 feet of the project site. The surveys shall be conducted before the beginning of any construction activities between February 1 and September 15. ◢ Impacts to nesting raptors shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction raptor surveys. Project activity shall not commence within the buffer areas until a qualified biologist has determined, in coordination with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. CDFW guidelines recommend implementation of a 500-feet-wide buffer for these raptor species, but the size of the buffer may be adjusted if a qualified biologist and the project proponent, in consultation with CDFW, determine that such an adjustment would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before ground disturbing activities with potential to affect northern harrier, white-tailed kite, or other raptor nests (i.e., activities proposed to occur in or within 500 feet of suitable habitat)	Conduct preconstruction surveys for white-tailed kite and northern harrier before the beginning of any construction activities between February 1 and September 15; establish appropriate buffers around active nest sites;

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Trees shall not be removed during the breeding season for nesting raptors unless a survey by a qualified biologist verifies that there is not an active nest in the tree. Similarly, because northern harrier is a ground nester, ground disturbances within suitable nesting habitat for northern harrier shall not commence unless a survey verifies that an active nest is not present.				
Mitigation Measure 4.4-5c: Protect loggerhead shrike, song sparrow, and grasshopper sparrow nests (Net SAP Area and PRSP Area) Before any ground-disturbing project activities begin, a qualified biologist will identify potential habitat for nesting loggerhead shrike, song sparrow, grasshopper sparrow, and other special-status bird species in areas that could be affected during the breeding season (February 1—August 31) by construction. To the extent feasible, construction-related vegetation removal shall occur outside the nesting season. If vegetation removal or other disturbance related to construction is required during the nesting season, focused surveys for active nests of special-status birds will be conducted before and within 14 days of initiating construction. A qualified biologist will conduct preconstruction surveys to identify active nests that could be affected. The appropriate area to be surveyed and timing of the survey may vary depending on the activity and species that could be affected. If no active nests are found during focused surveys, no further action under this measure will be required. If an active loggerhead shrike, song sparrow, grasshopper sparrow, or other special-status bird nest is located during the preconstruction surveys, the biologist will notify CDFW. If necessary, modifications to the project design to avoid removal of occupied habitat while still achieving project objectives will be evaluated and implemented to the extent feasible. If avoidance is not feasible, construction will be prohibited within a minimum of 100 feet of the nest to avoid disturbance until the nest is no longer active. These recommended buffer areas may be reduced or expanded through consultation with CDFW. Monitoring of all occupied nests shall be conducted by a qualified biologist during construction activities to adjust the 100-foot buffer if agitated behavior by the nesting bird is observed.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Before any ground-disturbing project activities begin	If vegetation removal or other disturbance is required during the nesting season, conduct focused surveys for active nests of special-status birds before and within 14 days of initiating construction; prohibit construction within a minimum of 100 feet of nests; monitor occupied nests during construction
Mitigation Measure 4.4-5d: Minimize disturbance and loss of bat roost sites (Net SAP Area and PRSP Area) Bat surveys shall be conducted by a qualified wildlife biologist within 14 days before any tree removal or clearing during each construction season. Locations of vegetation and tree removal or excavation will be examined for potential bat roosts. Specific survey methodologies will be determined in coordination with CDFW, and may include visual surveys of bats (e.g., observation of bats during foraging period), inspection for suitable habitat, bat sign (e.g., guano), or use of ultrasonic detectors (e.g., Sonobat, Anabat). Removal of any significant roost sites located will be avoided to the extent feasible. If it is determined that an active roost site cannot be avoided and will be affected, bats will be excluded from the roost site before the site is removed. The biologist	Net SAP Area and PRSP Area	Placer County Planning Services Division	Conduct bat surveys within 14 days before any tree removal or clearing during each construction season	Satisfied before any tree removal or clearing during each construction season

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
shall first notify and consult with CDFW on appropriate bat exclusion methods and roost removal procedures. Exclusion methods may include use of one-way doors at roost entrances (bats may leave, but not reenter), or sealing roost entrances when the site can be confirmed to contain no bats. Once it is confirmed that all bats have left the roost, crews will be allowed to continue work in the area. Exclusion efforts may be restricted during periods of sensitive activity (e.g., during winter hibernation or while females in maternity colonies are nursing young [generally, during late spring and summer]). If a hibernation or maternity roosting site is discovered, the project developer will consult with CDFW to establish appropriate exclusionary buffers until all young are determined to be volant (i.e., able to fly) by a qualified biologist. Once it is determined that all young are volant, passive exclusion devices shall be installed and all bats will be allowed to leave voluntarily. Once it is determined by a qualified biologist that all bats have left the roost, crews will be allowed to work within the buffer zone.				
Mitigation Measure 4.4-5e: Protect active American badger den sites (Net SAP Area and PRSP Area) Before construction activities within suitable habitat for American badger, a qualified biologist shall conduct surveys to identify any American badger burrows/dens. These surveys shall be conducted not more than 15 days before the start of construction. If occupied burrows are not found, further mitigation will be not required. If occupied burrows are found, CDFW shall be notified and impacts to active badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction-related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week to track the status of the den and to determine when a den area has been cleared for construction.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Conduct surveys not more than 15 days before the start of construction within suitable habitat for American badger	Monitor each occupied den once per week to track the status of the den and to determine when a den area has been cleared for construction
Mitigation Measure 4.4-5f: Coordinate with City of Roseville regarding mitigation for impacts on special-status reptile, bird, and mammal species resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for loss of special-status animals resulting from construction of the Pleasant Grove Retention Facility and other off-site improvements within the City's jurisdiction. As a part of its CEQA process for each improvement project, the City of Roseville, as lead agency, would identify and implement appropriate mitigation for significant impacts to special-status reptile, bird, and mammal species. Placer County would play a coordinating role but would have no jurisdiction or control over the timing and implementation of mitigation for off-site improvements that occur outside its own jurisdiction.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for each improvement project	Satisfied with City of Roseville's issuance of CEQA NOD for each improvement project

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.4-6a: Avoid, minimize, or compensate for loss of riparian habitat (Net SAP Area and PRSP Area) ◢ The County shall require future project proponents, including for off-site improvements, to retain a qualified botanist to identify, map, and quantify riparian habitat and other sensitive natural communities on the project site before final project design is completed. ◢ If impacts on riparian habitat cannot be avoided as part of future project construction, the project proponent shall compensate for loss of riparian habitat through participation in the PCCP if it has been adopted and is available for mitigation for project impacts. Per the PCCP, mitigation shall be through off-site restoration at an area ratio of at least 1.5:1 and shall be funded through fees paid in addition to land conversion fees. On-site restoration by the project proponent may serve in lieu of some or all of the Special Habitat fees if it meets all the applicable requirements described in the PCCP conservation measures and implementation plan. ◢ If the PCCP is not adopted, the project proponent shall consult with the County and CDFW to determine appropriate mitigation for removal of riparian habitat resulting from project implementation. Mitigation measures may include restoration of affected habitat on site and in kind, restoration of another section of stream within the project area, habitat restoration off site, or payment of a mitigation fee to a CDFW-approved mitigation bank. The compensation habitat shall be similar in composition and structure to the habitat/natural community to be removed and shall be at ratios adequate to offset the loss of habitat functions in the affected project area so that there is no-net-loss of riparian habitat functions, consistent with Placer County General Plan policy and CDFW regulations. ◢ If required, the project proponents shall obtain a Section 1602 streambed alteration agreement from CDFW and comply with all conditions of the agreement.	Net SAP Area and PRSP Area	Placer County Planning Services Division and CDFW	Biologist retained before final project design is completed; PCCP participation with submittal of improvement plan; if PCCP is not available, compensation will be implemented prior to approval of improvement plans; 1602 streambed alteration agreement obtained prior to construction within an applicable feature	Satisfied upon payment of PCCP fees and completion of PCCP-required avoidance and minimization measures
Mitigation Measure 4.4-6b: Coordinate with City of Roseville regarding mitigation for impacts on riparian habitat resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for loss of riparian habitat resulting from construction of the Pleasant Grove Retention Facility within the City's jurisdiction. As a part of its CEQA process for the Pleasant Grove Retention Facility project, the City of Roseville, as lead agency, would identify and implement appropriate mitigation for significant impacts to riparian habitat. Placer County would play a coordinating role but would have no control over the timing and implementation of mitigation for off-site improvements that occur outside its jurisdiction.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for the Pleasant Grove Retention Facility project	Satisfied with City of Roseville's issuance of the CEQA NOD for the Pleasant Grove Retention Facility project

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees (Net SAP Area and PRSP Area) ◢ The County shall require future project proponents, including proponents for off-site improvements, to avoid tree removal or death if feasible and appropriate, through incorporation of these features into project design and planning.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Install exclusion fencing before the start of construction	Satisfied with construction inspection
◢ All trees retained on-site shall be protected from construction-related impacts by placing exclusion fencing one foot outside the drip line of retained trees, or one foot outside the outer edge of the riparian woodland habitat, and maintaining said fencing through the duration of construction.				
◢ If any trees protected under County ordinance cannot feasibly be avoided, they shall be mitigated through the payment of PCCP land conversion fees and incorporation of its avoidance and minimization measures into the project. If the PCCP is not approved prior to project development, trees subject to loss shall be replaced at a 1:1 ratio (1 new inch dbh of tree for each inch dbh lost), unless alternative mitigation is approved by the County pursuant to Placer County Code Article 12.16. Replacement trees will be a minimum of 15-gallon size plantings and will be the same or similar native species as the tree removed. Replacement trees may be planted on-site to areas that would not be developed or to nearby offsite open space areas. Alternatively, if approved by the County, trees to be removed may be transplanted to other open space areas in proximity to the SAP area. Payment of an in-lieu fee to the Placer County tree preservation fund may also be allowed to compensate for tree loss.	Net SAP Area and PRSP Area	Placer County Planning Services Division	With submittal of improvement plans or with submittal of design review application	Satisfied upon payment of PCCP fees and completion of PCCP-required avoidance and minimization measures
◢ The project proponent required to replace lost trees shall provide appropriate irrigation and maintenance to replacement trees and will enter into a maintenance agreement with the County. The project proponent shall post a deposit for the replacement cost of replanted trees to the County and the deposit shall be retained until the County arborist certifies that conditions of the tree permit have been satisfied.	Net SAP Area and PRSP Area	Placer County Planning Services Division	Enter maintenance agreement with the County and post deposit for replacement cost of replanted trees prior to design review approval or approval of improvement plans	Monitor replacement trees for three years; replace any dead replacement trees and maintain these trees until established
◢ Any replacement tree that is dead after three years shall be replaced in kind with equal-sized, healthy replacements and these trees shall be maintained until established.				
Mitigation Measure 4.4-7b: Coordinate with City of Roseville regarding mitigation for loss of trees protected under City ordinance resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for loss of trees resulting from construction of the Pleasant Grove Retention Facility and other off-site improvements within the City's jurisdiction. As a part of its CEQA process for each improvement project, the City of Roseville as lead agency, would identify and implement appropriate mitigation for significant loss of trees and would comply with City ordinances. Placer County would play a coordinating role but would have no control over the timing and implementation of mitigation for off-site improvements that occur outside its jurisdiction.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for each improvement project	Satisfied with City of Roseville's issuance of the CEQA NOD for each improvement project

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.4-8a: Provide wildlife crossing for Placer Parkway (Net SAP Area and PRSP Area) The County shall coordinate with PCTPA during the design of Placer Parkway to incorporate safe wildlife-crossing features, as feasible. Design features that promote wildlife crossing could include (but may not be limited to) sizing bridges/culverts sufficiently to allow wildlife movement between the Net SAP and PRSP open space areas and locating them to maximize the connection between open space areas. The County shall work with a qualified biologist to determine the appropriate size and location of these wildlife crossing points.	Net SAP Area and PRSP Area	Placer County Planning Services Division, ESD, DPW, and PCTPA	During the design of Placer Parkway	Satisfied with approval of final design of Placer Parkway improvement plans
Mitigation Measure 4.4-8b: Provide interconnected natural areas (Net SAP Area) The County shall require the maintenance of open space and natural areas in the Net SAP area that are interconnected and of sufficient size to protect biodiversity, accommodate wildlife movement, and sustain ecosystems. The County will work with proponents of future projects in the Net SAP area to identify and design an appropriate wildlife movement corridor, consistent with the PCCP conservation strategy (if adopted), between the open space preserve area in the PRSP area and the Reserve/Mitigation Preserve lands in the northern portion of the SAP. The location of movement corridors should be coordinated with the wildlife crossings in Placer Parkway (See Mitigation Measure 4.4-8a).	Net SAP Area	Placer County Planning Services Division	Prior to approval of projects within the Net SAP Area	Satisfied upon approval of projects within the Net SAP Area
Mitigation Measure 4.4-8c: Provide wildlife crossing structures (Net SAP Area and PRSP Area) The County shall require road crossings over the stream system open space areas to be designed to provide safe wildlife movement using wildlife overpasses, underpasses, bridges, or culverts that are adequately sized to allow safe crossing even during high water. Design of crossings shall be based on movement requirements for the range of common and sensitive native wildlife species in the region. Where feasible and appropriate, fencing may be used to direct animals toward wildlife crossing structures and away from roadways. For the Sac State–Placer Center site, safe wildlife movement facilities shall be provided as feasible.	Net SAP Area and PRSP Area	Placer County Planning Services Division and ESD	Prior to approval of improvement plans showing road crossings over stream systems	Satisfied with approval of improvement plans
Mitigation Measures Implement Mitigation Measure 4.4-5d: Minimize Disturbance and Loss of Bat Roost Sites	See Mitigation Measure 4.4-5d, above	See Mitigation Measure 4.4-5d, above	See Mitigation Measure 4.4-5d, above	See Mitigation Measure 4.4-5d, above

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.4-9: Coordinate with City of Roseville regarding mitigation for loss of maternity bat colonies resulting from off-site improvements outside the County's jurisdictional boundaries (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville regarding mitigation for loss of maternity bat colonies resulting from construction of the Pleasant Grove Retention Facility and off-site transportation and utility improvements within the City's jurisdiction. As a part of its CEQA process for each improvement project, the City of Roseville would identify and implement appropriate mitigation for significant impacts to maternity bat colonies. Placer County would play a coordinating role but would have no control over the timing and implementation of mitigation for off-site improvements that occur within the City of Roseville.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	As a part of the City of Roseville's CEQA process for each improvement project	Satisfied with City of Roseville's issuance of the CEQA NOD for each improvement project
4.5 Archaeological, Historical, and Tribal Cultural Resources				
Mitigation Measure 4.5-1a: Identified resource avoidance (PRSP Area) Based on UAIC's identification of a 0.96-acre area where on-site topography mimics conditions on a nearby unrelated project site (where the tribe has identified significant TCRs), as well as identification of a potentially indicative surface artifact at this location, the following mitigation measure shall be implemented: Prior to recordation of the final large lot subdivision map for the area including the 0.96-acre area, one of the following two actions shall be taken: 1. Subsurface soil testing shall be conducted with UAIC tribal monitors present within the 0.96-acre sensitive area identified by the Tribe to determine that TCRs are absent and therefore that no restrictions or map changes are necessary, or 2. The 0.96-acre sensitive area shall be either: ◢ designated as Open Space on the land use plan; or ◢ restricted on the map and deed to preclude construction of any structures, roadway or utility infrastructure, agricultural cultivation, or other earth-disturbing activities. If this identified resource will be avoided (and no subsurface testing will be conducted), project construction plans shall demarcate the area through "Environmentally Sensitive Area" notation. The demarcations shall be reviewed and approved by UAIC before finalization to ensure they correctly identify the location of the TCRs. Before each phase of construction, including staging of equipment, silt fence installation, and clearing and grubbing, the construction contractor shall install protective fencing at the perimeter of the Environmentally Sensitive Area as shown on the plans and as verified by UAIC. Installation of the fencing shall be monitored by a UAIC monitor. The fencing shall be maintained and repaired as needed and to the satisfaction of the County's Development Review Committee and UAIC for the duration of the construction activity.	PRSP Area	Placer County CDRA Development Review Committee, ESD, and UAIC	Subsurface soil testing - prior to recordation of the final Large Lot Subdivision Map for the PRSP area, including the 0.96-acre area Identification of avoidance area and/or deed restriction – with submittal of final Large Lot Subdivision Map	Subsurface soil testing - Install protective fencing at the perimeter of the Environmentally Sensitive Area before each phase of construction (including clearing and grubbing); maintain and repair the fencing for the duration of the construction activity Identification of avoidance area and/or deed restriction – complete with approval of final Large Lot Subdivision Map

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.5-1b: Inadvertent discoveries (Net SAP Area and PRSP Area) If potential Native American prehistoric, historic, archaeological, or cultural resources, including midden soil, artifacts, chipped stone, exotic rock (nonnative), or unusual amounts of baked clay, shell, or bone, are uncovered during any on-site construction activities, all work must immediately stop in the area. Work shall cease within 100 feet of the find regardless of whether the construction is being actively monitored by a cultural resources specialist, professional archaeologist, or representative from UAIC. Following discovery, a professional archaeologist shall be retained to evaluate the significance of the deposit, and the Placer County Community Development Resource Agency, the Department of Museums, and Native American representatives from UAIC shall make recommendations for further evaluation and treatment, as appropriate. If Native American prehistoric, historic, archaeological, or cultural deposits or isolates found to be ineligible for inclusion in the CRHR are identified within the SAP area, UAIC shall be notified. Culturally appropriate treatment and disposition shall be determined following coordination with UAIC. Culturally appropriate treatment may involve processing materials in a lab for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, and returning objects to a location within the project area where they will not be subject to future impacts. UAIC does not consider curation of TCRs to be appropriate or respectful and request that materials not be permanently curated, unless requested by the tribe. If articulated or disarticulated human remains are discovered during construction activities, the County coroner and NAHC shall be contacted immediately. Upon determination by the County coroner that the find is Native American in origin, the NAHC will assign the Most Likely Descendant (MLD), who will work with the project proponent to define appropriate treatment and disposition of the burials. Following a review of the find and consultation with the Native American tribe and appropriate experts, if necessary, the authority to proceed may be accompanied by the addition of development requirements or special conditions that provide for protection of the site and/or additional measures necessary to address the unique or sensitive nature of the site. Work in the area of the cultural resource discovery may proceed only after authorization is granted by the Placer County Community Development Resource Agency following coordination with tribal representatives and cultural resource experts, as appropriate.	Net SAP Area and PRSP Area	Placer County CDRA Development Review Committee and ESD	During any construction activities	Continuously during any construction activities; ongoing monitoring by ESD construction inspection during individual project construction

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.5-1c: Tribal monitoring (PRSP Area) An area within the PRSP area has been identified by UAIC as having the potential for significant cultural finds based on the presence of multiple surface isolates. Before commencement of earth-disturbing activities in the PRSP area, a tribal site monitor from UAIC shall be contacted. The monitor shall identify a site boundary and demarcate an "Environmentally Sensitive Area." In this area, the project proponent and/or its construction contractor(s) shall accommodate Native American monitors or their representatives on the construction site during ground-disturbing activities, including vegetation clearing, grubbing, and stripping or other earth-moving/disturbing activities, such as grading or excavation. Native American monitors or their representatives will have the authority to request that work be temporarily stopped, diverted, or slowed if sites or objects of significance are identified within 100 feet of the direct impact area. Only a Native American monitor or representative shall recommend appropriate treatment and final disposition of TCRs.	PRSP Area	Placer County CDRA Development Review Committee ESD, and UAIC	Before commencement and during earth-disturbing activities in the PRSP area	Continuously during earth-disturbing activities in the PRSP area; ongoing monitoring by ESD construction inspection during individual project construction
Mitigation Measure 4.5-1d: Tribal cultural resource awareness training (Net SAP Area and PRSP Area) Before initiation of construction in the areas defined by UAIC as potentially sensitive, all construction crew members, consultants, and other personnel involved in project implementation shall receive project-specific TCR awareness training. The training shall be conducted in coordination with qualified cultural resource specialists and representatives from UAIC. The training will emphasize the requirement for confidentiality and culturally appropriate, respectful treatment of any find of significance to UAIC. As a component of the training, a brochure will be distributed to all personnel associated with project implementation. At a minimum, the brochure shall discuss the following topics in clear and straightforward language: ◢ field indicators of potential archaeological or cultural resources (e.g., what to look for; for example: archaeological artifacts, exotic or nonnative rock, unusually large amounts of shell or bone, significant soil color variation); ◢ regulations governing archaeological resources and TCRs; ◢ consequences of disregarding or violating laws protecting archaeological or TCRs; and ◢ steps to take if a worker encounters a possible resource. The training shall include project-specific guidance for on-site personnel, including agreed upon protocols for resource avoidance, when to stop work, and whom to contact if potential archaeological or TCRs are identified. The training shall also address directing work to stop and contacting the County coroner and the NAHC immediately if potential human remains are identified. NAHC will assign an MLD if the remains are determined by the coroner to be Native American in origin.	Net SAP Area and PRSP Area	Placer County CDRA Development Review Committee and UAIC	Before initiation of construction in the areas defined by UAIC as potentially sensitive	Satisfied when project-specific TCR awareness training is conducted

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.5-1e: Site visit after ground disturbance (Net SAP Area) The project proponent shall notify the CEQA lead agency a minimum of 7 days before initiation of ground disturbance to allow the agency time to notify culturally affiliated tribes. Tribal representatives from culturally affiliated tribes shall be allowed access to the project site within the first 5 days of ground-breaking activity to inspect soil piles, trenches, or other disturbed areas. If potential Native American prehistoric, historic, archaeological, or cultural resources, including midden soil, artifacts, chipped stone, exotic rock (nonnative), or unusual amounts of baked clay, shell, or bone, are identified during this initial inspection following ground disturbance, the following actions shall be taken: ◢ Work shall be suspended within 100 feet of the find, and the project proponent shall immediately notify the CEQA lead agency representative. The project proponent shall coordinate any subsequent investigation of the site with a qualified archaeologist approved by the Placer County Community Development Resource Agency and a tribal representative from the culturally affiliated tribe(s). The archaeologist shall coordinate with the culturally affiliated tribe(s) to allow for proper management recommendations if potential impacts on the resources are found by the CEQA lead agency representative to be significant. ◢ A site meeting of construction personnel shall be held to afford the tribal representative the opportunity to provide TCR awareness information. ◢ A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the CEQA lead agency representative by the qualified archaeologist. Possible management recommendations for historical or unique archaeological resources or TCRs could include resource avoidance, preservation in place, reburial on-site, or other measures deemed acceptable by the project proponent, the County, and the tribal representative from the culturally affiliated tribe(s). The contractor shall implement any measures deemed by the CEQA lead agency representative staff to be necessary and feasible to avoid or minimize significant effects on the TCR, including the use of a Native American monitor whenever work is occurring within 100 feet of the find.	Net SAP Area	Placer County CDRA Development Review Committee and UAIC	Project proponent to notify the County a minimum of 7 days before initiation of ground disturbance to allow the County time to notify culturally affiliated tribes	Provide project site access to tribal representatives from culturally affiliated tribes within the first 5 days of ground-breaking activity; implement any measures deemed by the County representative staff to be necessary and feasible to avoid or minimize significant effects on the TCR, including the use of a Native American monitor whenever work is occurring within 100 feet of the find
Mitigation Measure 4.5-1f: Lead agency notification (Net SAP Area and PRSP Area) A minimum of 7 days before beginning earthwork or other soil-disturbing activities, the project proponent shall notify the CEQA lead agency representative of the proposed earthwork start date to provide the CEQA lead agency representative adequate time to contact UAIC regarding TCR concerns.	Net SAP Area and PRSP Area	Placer County CDRA Development Review Committee	Project proponent to notify the County representative a minimum of 7 days before beginning earthwork or other soil-disturbing activities to provide the County adequate time to contact UAIC regarding TCR concerns	Satisfied with notification of the County representative

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.5-1g: Woodcreek Water Treatment Plant (Other Off-Site Transportation and Utility Improvements) Although identified as a possible off-site improvement, it is highly unlikely that any improvements related to the SAP project, including the PRSP, will ever occur at this recycled water facility. This facility is located in the City of Roseville and is outside County jurisdiction. In the unlikely event that the County's project requires work at this location, the County will coordinate with City of Roseville regarding consultation with UAIC.	Other Off-Site Transportation and Utility Improvements	Placer County CDRA Development Review Committee and City of Roseville	Coordinate with City of Roseville regarding consultation with UAIC prior to construction at the Woodcreek Water Treatment Plant, if such work would occur	Satisfied with coordination with City of Roseville
Mitigation Measure 4.5-1h: Pleasant Grove Retention Facility (Pleasant Grove Retention Facility) This is a proposed regional retention facility that will be constructed on City of Roseville–owned land and may be operated in accordance with a joint operations agreement developed by the participating jurisdictions. The City has already prepared a programmatic CEQA document for the project and will be the CEQA lead agency for the project-level (construction) CEQA analysis. City staff also will prepare the engineering improvement plans. When the project-level CEQA analysis occurs, the City of Roseville will be the lead agency responsible for AB 52 consultation. During consultation for the off-site improvements, the City agreed to allow UAIC to participate, on a voluntary basis, in any subsequent pedestrian surveys that may be conducted in support of the cultural resource and tribal cultural resource sections of its future CEQA document.	Pleasant Grove Retention Facility	Placer County CDRA Development Review Committee and City of Roseville	When the project-level CEQA analysis occurs for the Pleasant Grove Retention Facility	Satisfied with completion of pedestrian surveys in support of the cultural resource and tribal cultural resource sections of a future CEQA document for the Pleasant Grove Retention Facility
Mitigation Measure 4.5-2: Require archaeological resource survey for areas outside the SAP (Pleasant Grove Retention Facility and Off-Site Transportation and Utility Improvements) The County shall coordinate with the City of Roseville for the preparation of a cultural resource evaluation report for the Pleasant Grove Retention Facility and off-site transportation and utility improvements, before grading, excavation, or other earthmoving activities begin. The evaluation should include preparing archaeological and historical survey reports. Any identified archaeological and historical sites (including structures 45 years of age or older) and materials should be evaluated and recorded on standard DPR 523-series forms in accordance with NRHP/CRHR criteria. The evaluation report should be completed by a qualified archaeologist, architectural historian, or historical architect who meets the Secretary of the Interior's Professional Qualifications for Archaeology and Historic Preservation, as appropriate, and submitted to the City of Roseville. Project contractors and construction managers should follow the recommendations identified in the report.	Pleasant Grove Retention Facility and Off-Site Transportation and Utility Improvements	Placer County CDRA Development Review Committee and City of Roseville	Before grading, excavation, or other earthmoving activities begin related to the Pleasant Grove Retention Facility and off-site transportation and utility improvements	Satisfied before grading, excavation, or other earthmoving activities begin related to the Pleasant Grove Retention Facility and off-site transportation and utility improvements

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
4.6 Geology and Soils				
Mitigation Measure 4.6-1a: Submit improvement plans (Net SAP Area and PRSP Area) The project proponent shall prepare and submit improvement plans, specifications, and cost estimates (in accordance with the requirements of Section II of the Land Development Manual that are in effect at the time of submittal) to ESD for review and approval. The plans shall show all physical improvements as required by the conditions for the project, as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, that may be affected by planned construction shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the improvement plans. The project proponent shall pay plan check and inspection fees and Placer County Fire Department improvement plan review and inspection fees with the first improvement plan submittal. (NOTE: Before plan approval, all applicable recording and reproduction costs shall be paid.) The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the project proponent's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the design/site review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, the review process shall be completed before improvement plans are submitted. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the project proponent's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD before site improvements are accepted by the County. Conceptual landscape plans submitted before project approval may require modification during the improvement plan process to resolve issues of drainage and traffic safety.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division and the Development Review Committee	With submittal of Improvement Plans	Satisfied with approval of Improvement Plans and during construction inspection
Mitigation Measure 4.6-1b: Implement improvement plans (Net SAP Area and PRSP Area) The improvement plans shall show all proposed grading, drainage improvements, and vegetation and tree removal, and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the improvement plans are approved and all temporary construction fencing has been installed and inspected by a member of the DRC. All cut/fill slopes shall be at a maximum of 2:1 (horizontal:vertical) unless a soils report supports a steeper slope and the ESD concurs with this recommendation.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division and the Development Review Committee	With submittal of Improvement Plans	Satisfied with approval of Improvement Plans and during construction inspection

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
The project proponent shall revegetate all disturbed areas. Revegetation, undertaken from April 1 through October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project improvement plans. It is the project proponent's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Stockpiled soil and borrow areas shall have proper erosion control measures applied for the duration of the construction as specified in the improvement plans. Erosion control shall be provided where roadside drainage is off the pavement, to the satisfaction of the ESD. The project proponent shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate for winterization and permanent erosion control work before improvement plan approval to guarantee protection against erosion and improper grading practices. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of the deposit shall be refunded to the project proponent or authorized agent. If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the improvement plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals before any further work is performed. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.				
Mitigation Measure 4.6-1c: Implement best management practices (Net SAP Area and PRSP Area) The improvement plans shall show that water quality treatment facilities/BMPs shall be designed according to the guidance of the California Stormwater Quality Association stormwater BMP handbooks for construction, for new development/redevelopment, and for industrial and commercial (or other similar source as approved by the ESD). Construction (temporary) BMPs for the project include, but are not limited to: ◢ straw mulch, ◢ velocity dissipation devices, ◢ silt fencing, ◢ fiber rolls, ◢ storm drain inlet protection, ◢ wind erosion control, and ◢ stabilized construction entrances.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division and the Development Review Committee	With submittal of Improvement Plans	Satisfied with approval of Improvement Plans and during construction inspection

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Storm drainage from on- and off-site impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, or similar features for entrapment of sediment, debris, and oils/greases or other identified pollutants as approved by the ESD. BMPs shall be designed in accordance with the *West Placer Storm Water Quality Design Manual* for Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection. No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals. All permanent BMPs shall be maintained as required to ensure effectiveness. The project proponent shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of ongoing maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees and certification of completed maintenance reported annually to the County Department of Public Works and Facilities Stormwater Coordinator unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of monthly parking lot sweeping and vacuuming and a catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Before improvement plan or final subdivision map approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.				
Mitigation Measure 4.6-1d: Submit improvement plans (Other Supporting Infrastructure) The County shall work with the project proponent to coordinate with the City of Roseville to make sure improvement plans are submitted that meet all City requirements for accurate identification of features, such as topographical features; location of existing utilities and easements; proposed landscaping and irrigation facilities within public right of way; proposed grading and drainage improvements; and vegetation and tree removal (as well as any other items the City of Roseville requires for improvement plans).	Other Supporting Infrastructure	City of Roseville (Placer County Engineering and Surveying Division to coordinate with City)	With submittal of Improvement Plans to the City of Roseville	During the City of Roseville's review of Improvement Plans
Mitigation Measure 4.6-1e: Implement improvement plans (Other Supporting Infrastructure) The County shall work with the project proponent to coordinate with the City of Roseville to make sure proposed grading, drainage improvements, and vegetation and tree removal are consistent with City requirements, including requirements for slopes and construction-related erosion control and stormwater quality protection as well as other specific City of Roseville requirements and conditions of approval.	Other Supporting Infrastructure	City of Roseville (Placer County Engineering and Surveying Division to coordinate with City)	With submittal of Improvement Plans to the City of Roseville	During the City of Roseville's review of Improvement Plans

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.6-1f: Implement best management practices (Other Supporting Infrastructure) The County shall work with the project proponent to coordinate with the City of Roseville to make sure that water quality treatment facilities/BMPs are designed according to the guidance of the California Stormwater Quality Association stormwater BMP handbooks for construction, for new development/redevelopment, and for industrial and commercial. Construction (temporary) BMPs include, but are not limited to: ◢ straw mulch, ◢ velocity dissipation devices, ◢ silt fencing, ◢ fiber rolls, ◢ storm drain inlet protection, ◢ wind erosion control, and ◢ stabilized construction entrances.	Other Supporting Infrastructure	City of Roseville (Placer County Engineering and Surveying Division to coordinate with City)	With submittal of Improvement Plans to the City of Roseville	During the City of Roseville's review of Improvement Plans
Mitigation Measure 4.6-2a: Submit preliminary and final geotechnical engineering reports (Net SAP Area) Proponents of projects within the net SAP area shall submit to ESD for review and approval a preliminary geotechnical report, prepared by a Registered Civil Engineer or Geotechnical Engineer, as part of the subsequent entitlement application review. Improvement plan submittals for development within the net SAP area shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for ESD review and approval. The report shall address and make recommendations on: ◢ road, pavement, and parking area design; ◢ structural foundations, including retaining wall design (if applicable); ◢ grading practices; ◢ erosion/winterization; ◢ special problems discovered on-site (e.g., groundwater, expansive/unstable soils); and ◢ slope stability. Once approved by the ESD, two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.	Net SAP Area	Placer County Engineering and Surveying Division and Building Services Division	With each Improvement Plan submittal	Satisfied with approval of Improvement Plans and during construction inspection

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.6-2b: Submit final geotechnical engineering report (PRSP Area) The Improvement plan submittals for development within the PRSP area shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for ESD review and approval. The report shall address and make recommendations on: ◢ road, pavement, and parking area design; ◢ structural foundations, including retaining wall design (if applicable); ◢ grading practices; ◢ erosion/winterization; ◢ special problems discovered on-site (e.g., groundwater, expansive/unstable soils); and ◢ slope stability. Once approved by the ESD, two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report. If the soils report indicates the presence of critically expansive or other soils problems that, if not corrected, could lead to structural defects, a certification of completion of the requirements of the soils report shall be required for subdivisions, before issuance of building permits. This certification may be completed on a lot-by-lot basis or on a tract basis. This shall be so noted on the improvement plans; in the development notebook; in the conditions, covenants, and restrictions; and on the informational sheet filed with the final subdivision map(s).	PRSP Area	Placer County Engineering and Surveying Division and Building Services Division	With each Improvement Plan submittal	Satisfied with approval of Improvement Plans and during construction inspection
Mitigation Measure 4.6-2c: Implement geotechnical recommendations (PRSP Area) Before approval of grading plans within the PRSP area, the project proponent shall submit, for review and approval by the County, site-specific soils engineering reports that include recommendations, based on the specific soil conditions, for design of foundations, roadway subgrades, grading and construction techniques, fill material and compaction, and other necessary recommendations in compliance with the CBC. Recommendations from the *Preliminary Geotechnical Engineering Report: Placer Ranch* (Wallace-Kuhl & Associates 2004) shall be incorporated into the site-specific soils engineering reports (and shall be updated as needed in accordance with CBC requirements). The following recommendation addresses expansive soils: ◢ Maintaining higher moisture content in subgrade soils at the time of construction, chemical treatment of near-surface soils (e.g., lime treatment), and/or deepened or post-tensioned foundation systems.	PRSP Area	Placer County Engineering and Surveying Division and Building Services Division	With each submittal of grading/improvement plans	Satisfied with approval of grading/improvement plans and during construction inspection

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.6-4a: Train construction personnel on protocol to follow if fossils are encountered (Net SAP Area and PRSP Area) Prior to construction commencing and before initiating earthmoving activities in areas likely to contain important paleontological or geologic features (including Upper Riverbank Formation, Turlock Lake, or undifferentiated Quaternary Alluvium sediments), project proponents shall retain a qualified paleontologist to train all construction personnel involved with earthwork in those areas. The paleontologist will teach construction workers about the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and the proper stop-work and County-approved notification procedures to follow if fossils are encountered. A note to contractors regarding this requirement shall be included on the Improvement Plans.	Net SAP Area and PRSP Area	Placer County Planning Services Division and ESD	Prior to construction commencing and before initiating earthmoving activities in areas likely to contain important paleontological or geologic features	Satisfied prior to construction commencing
Mitigation Measure 4.6-4b: Train construction personnel on protocol to follow if fossils are encountered (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville to make sure project proponents retain a qualified paleontologist to train all construction personnel involved with earthwork in geologic units with high paleontological sensitivity. The paleontologist should teach construction workers about the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and the proper stop-work and notification procedures to follow if fossils are encountered.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division and ESD to coordinate with City)	Prior to construction commencing and before initiating earthmoving activities in areas likely to contain important paleontological or geologic features	Satisfied prior to construction commencing
4.7 Greenhouse Gas Emissions				
Mitigation Measure 4.7-2a: Implement all feasible on-site features to reduce operational GHG emissions (Net SAP Area and PRSP Area) The County will require project proponents of development proposed under the project to incorporate the following measures to reduce operational emissions of GHGs to the extent feasible. <u>Transportation</u> ◢ For each single-family residential unit, install a listed raceway, associated overcurrent protective device and the balance of a dedicated 208/240-volt branch circuit at 40 amperes (amp) minimum. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or unit subpanel and shall terminate into a listed cabinet, box, or other enclosure near the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity for a 40-ampere minimum dedicated branch circuit. All electrical circuit components and Electric Vehicle Service Equipment (EVSE), including a receptacle or box with a blank cover, related to this section shall be installed in accordance with the California Electrical Code.	Net SAP Area and PRSP Area	Placer County Planning Services Division and the PCAPCD	With submittal of Design Review application, tentative subdivision map submittal, and/or improvement plan submittal	Satisfied with approval of Design Review, tentative subdivision maps, improvement plans, building permit, and/or with construction inspections, as applicable

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Multi-family residential buildings shall design at least 10 percent of parking spaces to include EVSE, or a minimum of two spaces to be installed with EVSE for buildings with 2-10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices. ◢ Non-residential buildings shall design at least 10 percent of parking spaces to include EVSE, or a minimum of two spaces to be installed with EVSE for buildings with 2-10 parking spaces. EVSE includes EV charging equipment for each required space connected to a 208/240-volt, 40-amp panel with conduit, wiring, receptacle, and overprotection devices. ◢ Non-residential land uses with 20 or more on-site parking spaces shall dedicate preferential parking spaces to vehicles with more than one occupant and ZEVs (including battery electric vehicles and hydrogen fuel cell vehicles). The number of dedicated spaces should be no less than two spaces or 5 percent of the total parking spaces on the individual project site, whichever is greater. These dedicated spaces shall be in preferential locations such as near the main entrances to the buildings served by the parking lot and/or under the shade of structure or trees. These spaces shall be clearly marked with signs and pavement markings. This measure shall not be implemented in a way that prevents compliance with requirements in the California Vehicle Code regarding parking spaces for disabled persons or disabled veterans. **Building Energy** Reduce GHG emissions associated with building energy through the following measures: ◢ Single family residential buildings constructed within the net SAP area and the PRSP area shall be designed to achieve a 30 percent reduction in energy use versus a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 2 of the 2016 California Green Building Standards Code, Section A4.203.1.2.2. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential energy modeling software. ◢ Multi-family residential buildings of three stories or less constructed within the net SAP area and the PRSP area shall be designed to achieve a 15 percent reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved by following the energy efficiency performance standards set forth in Tier 1 of the 2016 California Green Building Standards Code, Action A4.203.1.2.1. These reductions shall be achieved by employing energy efficient design features and/or solar photovoltaics. Compliance shall be demonstrated using CEC-approved residential modeling software.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Commercial buildings (including multi-family residential structures four stories or higher) shall be designed to achieve a 10 percent or greater reduction in energy use compared to a standard 2016 Title 24 code-compliant building. Reductions in energy shall be achieved through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Reductions can also be achieved by incorporation of co-generation facilities. Alternatively, this could be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use. ◢ All project buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Code, Sections A4.106.5 and A5.106.11.2. ◢ All project buildings shall comply with requirements for water efficiency and conservation as described in the 2016 California Green Building Standards Code, Divisions 4.3 and 5.3. ◢ Multiple electrical receptacles shall be included on the exterior of all non-residential buildings and accessible for purposes of charging or powering electric landscaping equipment and providing an alternative to using fossil fuel-powered generators. The electrical receptacles shall have an electric potential of 100 volts. There should be a minimum of one electrical receptacle on each side of the building and one receptacle every 100 linear feet around the perimeter of the building. This measure is consistent with SAP Policy NR-6.6, encourages installation of electric outlets to promote the use of electric landscape maintenance equipment. ◢ Ensure that all appliances and fixtures installed in buildings developed under the project are Energy Star®–certified if an Energy Star®–certified model of the appliance is available. Types of Energy Star®–certified appliances include boilers, ceiling fans, central and room air conditioners, clothes washers, compact fluorescent light bulbs, computer monitors, copiers, consumer electronics, dehumidifiers, dishwashers, external power adapters, furnaces, geothermal heat pumps, programmable thermostats, refrigerators and freezers, residential light fixtures, room air cleaners, transformers, televisions, vending machines, ventilating fans, and windows (EPA 2018). If EPA's Energy Star® program is discontinued and not replaced with a comparable certification program before appliances and fixtures are selected, then similar measures which exceed the 2016 California Green Building Standards Code may be used.				
Mitigation Measure 4.7-2b: Purchase carbon offsets (Net SAP Area and PRSP Area) The County will require project proponents of individual developments under the project to offset operational GHG emissions remaining after implementation of Mitigation Measure 4.7-2a. This mitigation measure is consistent with guidance recommended by PCAPCD and CARB (PCAPCD 2017:54, CARB 2017:152). This measure is also consistent with the State CEQA Guidelines, which recommend several options for mitigating GHG emissions. State CEQA Guidelines Section 15126.4(C)(3) states that measures to mitigate the significant effects of GHG emissions may include "off-site measures, including offsets that are not otherwise required...."	Net SAP Area and PRSP Area	Placer County Planning Services Division and the PCAPCD	With submittal of Design Review application, tentative subdivision map submittal, and/or improvement plan submittal	Satisfied with approval of Design Review, tentative subdivision maps, improvement plans, building permit, and/or with construction inspections, as applicable

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Project proponents shall implement an off-site GHG emissions reduction program or to pay GHG offset fees to compensate for the project's emissions in excess of 1,100 $MTCO_2e$ for a single year, or as determined feasible by the County and project proponents. The off-site program shall comply with approved protocols from California Air Pollution Control Officers Association's (CAPCOA) GHG Rx program or CARB's Cap & Trade Offset protocols. Alternatively, the project proponent can purchase local or California-only GHG mitigation credits through the CAPCOA GHG Rx program or ARB accredited offset project registry. At the time this EIR was written, the average rate ranges from $8 to $35 per metric ton of CO_2e. The net SAP area would generate 367,900 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be 366,800 MT CO_2e for a period of one year, or 49.13 $MTCO_2e$/year per thousand square feet of nonresidential development and 27.27 $MTCO_2e$/year for each residential unit in the net SAP area. PRSP would generate 195,990 $MTCO_2e$/year after implementation of Mitigation Measure 4.7-2a. The total GHG emission offset requirement would be 194,890 $MTCO_2e$, or 27.27 $MTCO_2e$/year for each residential unit in the PRSP area. Detailed calculations for the Off-Site Mitigation Fee Program can be found in Appendix K. This condition shall be satisfied prior to the recordation of each Small Lot Final Map or building permit issuance when a small lot map is not required. PCAPCD and CARB also recommend that lead agencies prioritize direct investments in GHG emission reductions near the project site to provide potential local air quality and economic co-benefits. Examples of local direct investments include financing installation of regional electric vehicle–charging stations, paying for electrification of public school buses, and investing in local urban forests. However, it is critical that any such investments in actions to reduce GHG emissions are real and quantifiable, as determined by the County, or a consultant selected by the County. Where development of a local offset is not feasible, the County will allow project proponents to mitigate GHG emissions through the purchase of carbon credits issued through the CAPCOA GHG Rx program or CARB-accredited offset project registry. The purchase of carbon credits shall be prioritized in the following manner: offsite within the SVAB portion of Placer County, within Placer County, or within California. The GHG reductions achieved through an offset or through the purchase of a carbon credit must meet the following criteria: ◢ **Real**–They represent reductions actually achieved (not based on maximum permit levels). ◢ **Additional/surplus**–They are not already planned or required by regulation or policy (i.e., not double counted). ◢ **Quantifiable**–They are readily accounted for through process information and other reliable data.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ **Enforceable**—They are acquired through legally binding commitments/agreements. ◢ **Validated**—They are verified through the accurate means by a reliable third party. ◢ **Permanent**—They will remain as GHG reductions in perpetuity. The project applicant can satisfy the requirements of this measure by purchasing sufficient carbon credits through the accredited carbon credit registries, investing in a local GHG reduction project/program which complies with the approved protocol from the CAPCOA GHG Rx program or CARB's Cap-and-Trade offset protocols, or paying the calculated mitigation fee based on the carbon credit rate at the time of the recordation of the small lot final map or approval of the first building permit when a small lot map is not required. Demonstration of compliance shall be provided to the County and carbon offset purchases should be verified by a third party. If the mitigation fee is chosen, the fee should be calculated based on the required GHG reduction and the latest CARB Cap-and-Trade Program Auction Settlement Prices for GHG allowances at the time of the small lot final map recordation or building permit issuance when a small lot map is not required.				
4.8 Hazards and Hazardous Materials				
Mitigation Measure 4.8-1a: Complete a Phase I ESA (Net SAP Area) A Phase I ESA shall be completed by project proponents of individual projects in the net SAP area. The Phase I ESA shall be performed in general conformance with the scope and limitations of ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and EPA "Standards and Practices for All Appropriate Inquires," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the project proponent shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted. These recommendations shall be implemented, and the site shall be deemed remediated by the appropriate agency (DTSC, Placer County Department of Environmental Health Services [PCDEHS]) or Placer County shall issue a No Further Action letter before earth disturbance in the vicinity of the contamination.	Net SAP Area	Placer County Environmental Health Services, in coordination with DTSC	With Design Review application, if applicable	Conduct follow-up sampling if existing hazardous materials contamination is identified in the Phase I ESA; implement recommendations continuously during project construction
Mitigation Measure 4.8-1b: Adhere to American Petroleum Institute and Transportation Research Board recommendations regarding setbacks from pipelines (Net SAP Area and PRSP Area) Before issuance of grading permits or improvement plans, project proponents shall demonstrate that final site design adheres to pipeline setback recommendations from API and the Transportation Research Board when permitting projects. API recommends setbacks of 50 feet from petroleum and hazardous liquid lines for new homes, businesses, and places of public assembly. It also recommends 25 feet for garden sheds, septic tanks, and water wells, as well as 10 feet for mailboxes and yard lights (API 2011).	Net SAP Area and PRSP Area	Placer County Environmental Health Services and ESD	Prior to approval of improvement plans and/or grading permits	Satisfied with issuance of grading permits or approval of improvement plans

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.8-1c: Prepare and implement a construction hazardous materials management plan (Net SAP Area and Net PRSP Area) Before issuance of grading permits or improvement plans, a construction hazardous materials management plan shall be prepared by the project proponent or the project proponent's construction-manager/contractor for all future development projects and shall be incorporated into the construction and contract specifications for each project. The plan shall be reviewed and approved by PCDEHS before any project construction. The management plan shall include measures to reduce potential hazards to workers, the public, and the environment associated with use of hazardous materials and exposure to potentially contaminated soil during project construction. The management plan shall include provisions for agency notification, managing impacted materials, sampling and analytical requirements and disposal procedures. Specifically, the construction hazardous materials management plan shall: ◢ describe the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction; ◢ describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials; ◢ include measures to protect worker safety if signs of contamination are encountered; ◢ identify sampling and analysis protocols for various substances that might be encountered; ◢ list required regulatory agency contacts if contamination is found; ◢ include recommendations on soil management in the event that aerially deposited lead is discovered in existing road right-of-way; ◢ identify legal and regulatory processes and thresholds for cleanup of contamination; ◢ include provisions for delineation, removal, and disposal of any contaminants identified as exceeding human health risk levels; and ◢ require that the project contractor follow all procedural direction given by PCDEHS to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with Section 31303 of the California Vehicle Code and the requirements of the licensed receiving facility.	Net SAP Area and PRSP Area	Placer County Environmental Health Services	With submittal of improvement plans and before issuance of grading permits	Preparation of construction hazardous materials management plan – satisfied with approval of improvement plans and grading permit Implementation of construction hazardous materials management plan – continuously during project construction
Mitigation Measure 4.8-1d: Complete a Phase I ESA (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville, which has jurisdiction over the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas, to verify one or more Phase I ESAs are completed for the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas). The Phase I ESA should be performed in general	Other Supporting Infrastructure	City of Roseville (Placer County Environmental Health Services to coordinate with City)	Prior to initiating ground-disturbing construction at the Pleasant Grove Retention Facility or off-site transportation and utility improvement areas	Conduct follow-up sampling if existing hazardous materials contamination is identified in the Phase I ESA; implement recommendations continuously

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
conformance with the scope and limitations of ASTM E 1527-13, "Standard Practice for Environmental Site Assessments," and EPA's "Standards and Practices for All Appropriate Inquires," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the project proponent should retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any require remediation that should be conducted. These recommendations should be implemented, and the site should be deemed remediated by the appropriate agency (DTSC, PCDEHS) or the City of Roseville should issue a No Further Action letter before earth disturbance in the vicinity of the contamination.				during project construction at the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas
Mitigation Measure 4.8-1e: Prepare and implement a construction hazardous materials management plan (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville, which has jurisdiction over the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas, to verify, before issuance of grading permits or improvement plans, that a construction hazardous materials management plan is prepared by the project proponent or the project proponent's construction manager/contractor for all future development projects and is incorporated into the construction and contract specifications for each project. The plan should be reviewed and approved by the appropriate City department before any project construction. The management plan should include measures to reduce potential hazards to workers, the public, and the environment associated with use of hazardous materials and exposure to potentially contaminated soil during project construction. The management plan should include provisions for agency notification, describe the proper procedure for managing affected materials, identify sampling and analytical requirements, and describe disposal procedures. Specifically, the construction hazardous materials management plan should: ◢ describe the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction; ◢ describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials; ◢ include measures to protect worker safety if signs of contamination are encountered; ◢ identify sampling and analysis protocols for various substances that might be encountered; ◢ list required regulatory agency contacts if contamination is found; ◢ include recommendations on soil management in the event that aerially deposited lead is discovered in existing road right-of-way;	Other Supporting Infrastructure	City of Roseville (Placer County Environmental Health Services to coordinate with City)	Prior to initiating ground-disturbing construction at the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas	Implement construction hazardous materials management plan continuously during project construction at the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ identify legal and regulatory processes and thresholds for cleanup of contamination; ◢ include provisions for the delineation, removal, and disposal of any contaminants identified as exceeding human health risk levels; and ◢ require that the project contractor follow all procedural direction given by PCDEHS to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with Section 31303 of the California Vehicle Code and the requirements of the licensed receiving facility.				
Mitigation Measure 4.8-2: Implement measures specified in CCR Title 27 to minimize intrusion of landfill gas into structures (Net SAP Area and PRSP Area) For any structure sited within 1,000 feet of the WRSL property boundary, the following measures specified in CCR Title 27 Section 21190(g) shall be included in the construction drawings (as applicable) for review and approval by the County Health and Human Services Department: ◢ a geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade; ◢ a permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade or slab; ◢ a geotextile filter shall be used to prevent the introduction of fines into the permeable layer; ◢ perforated venting pipes shall be installed within the permeable layer, and shall be designed to operate without clogging; ◢ the venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system; and ◢ automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected. In addition, the developer or building operator shall agree to hire a qualified specialist to conduct periodic methane gas monitoring (pursuant to CCR Section 20920 et. seq.) inside all buildings and underground utilities and submit results to the County Health and Human Services Department. The County Health and Human Services Department may require additional measures specified in Title 27 Section 21190(g), depending on the specific circumstances.	Net SAP Area and PRSP Area	Placer County Environmental Health Services	With submittal of improvement plans and/or building permit	Satisfied with approval improvement plans and/or building permits.

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.8-3a: Prepare and enforce a Construction Traffic Management Plan (Net SAP Area and PRSP Area) Before construction of any project within the SAP area, the project proponent shall submit to the County for review and approval a Construction Traffic Management Plan to minimize traffic impacts on all roadways at and near the work site affected by construction activities. The plan shall include construction and public (if applicable) access points, procedures for notification of road closures, construction materials delivery plan, a description of emergency personnel access routes during road closures. This plan shall reduce potential traffic safety hazards and ensure adequate access for emergency responders.	Net SAP Area and PRSP Area	Placer County Department of Public Works and the Engineering and Surveying Division	With submittal of improvement plans and/or building permit	Preparation of Construction Traffic Management Plan – satisfied with approval of improvement plans and/or building permit Monitoring/enforcing of Traffic Management Plan - continuously during project construction within the SAP area, including the PRSP area; ongoing monitoring by ESD construction inspection during individual project construction
Mitigation Measure 4.8-3b: Prepare and enforce a Construction Traffic Management Plan (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville, which has jurisdiction over the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas, to verify, before construction of any project in the other supporting infrastructure areas (Pleasant Grove Retention Facility and off-site transportation and utility improvement areas), that the project proponent submits to the City for review and approval a Construction Traffic Management Plan to minimize traffic impacts on all roadways at and near the work site affected by construction activities. The plan should include construction and public (if applicable) access points, procedures for notification of road closures, construction materials delivery plan, a description of emergency personnel access routes during road closures. This plan should reduce potential traffic safety hazards and ensure adequate access for emergency responders.	Other Supporting Infrastructure	City of Roseville (Placer County Department of Public Works and the Engineering and Surveying Division to coordinate with City)	Before construction of any project at the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas	Continuously during project construction at the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas
Mitigation Measure 4.8-6a: Vector control during construction and operation (Net SAP and PRSP Areas) During construction, all grading shall be performed by contractors in a manner to prevent the occurrence of standing water or other areas suitable for breeding of mosquitoes and other vectors. The Placer Mosquito and Vector Control District shall be granted access to perform vector control both during construction and operation of the SAP and PRSP. This includes ongoing access to all common areas including drainages, open space corridors, and park areas. As part of the access agreement with Placer Mosquito and Vector Control District, the County shall require that the district use appropriate vector control methods in biologically sensitive areas to minimize any potential adverse effects to sensitive wildlife and plant species or their habitat.	Net SAP Area and PRSP Area	Placer Mosquito and Vector Control District	During construction within the net SAP and PRSP areas	Continuously during construction and operation

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.8-6b: Vector control during construction and operation (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville, which has jurisdiction over the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas, to verify during construction that all grading is performed by contractors in a manner to prevent the occurrence of standing water or other areas suitable for breeding of mosquitoes and other vectors. The Placer Mosquito and Vector Control District should be granted access to perform vector control both during construction and operation of the Pleasant Grove Retention Facility. As part of the access agreement with Placer Mosquito and Vector Control District, the City should require that the district use appropriate vector control methods in biologically sensitive areas to minimize any potential adverse effects on sensitive wildlife and plant species or their habitat.	Other Supporting Infrastructure	City of Roseville (Placer Mosquito and Vector Control District to coordinate with City)	During construction at the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas	Continuously during construction and operation
4.9 Hydrology and Water Quality				
Mitigation Measure 4.9-1a: Submit final drainage report (Net SAP Area and PRSP Areas) As part of the improvement plan submittal process, the preliminary drainage report provided during environmental review shall be submitted in final format. The final drainage report may require more detail than that provided in the preliminary report and will be reviewed in concert with the improvement plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project, as well as watershed maps. The report shall identify permanent water quality protection features and methods to be used during construction as well as long-term postconstruction water quality measures. The final drainage report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect when the report is submitted.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	With submittal of improvement plans	Satisfied with approval of Improvement Plans
Mitigation Measure 4.9-1b: Design, construct, and maintain regional stormwater retention and detention facilities or pay retention mitigation fees (Net SAP Area and PRSP Areas) The improvement plan submittal and final drainage report shall demonstrate, through the preparation of technical engineering studies, that the increased peak flow and volume of stormwater runoff from the proposed development can be accommodated on-site or in the approved City of Roseville Regional Stormwater Retention facility and/or other off-site facility. The study shall:	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	With submittal of Improvement Plans	Satisfied with approval of Improvement Plans and during construction inspection

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
1. Be submitted to the City of Roseville Public Works Department for review and concurrence if the net SAP or PRSP is proposing to utilize the City of Roseville Regional Stormwater Retention facility for stormwater retention. 2. Demonstrate, through the preparation of technical engineering studies, that stormwater run-off peak flows obtain an objective post-project mitigated peak flow that is equal to the estimated pre-project peak flow, less 10 percent of the difference, through the installation of detention facilities; and, 3. Demonstrate, through the preparation of technical engineering studies, that stormwater volumetric increases are mitigated to retain the increase for the 100-year, 8-day design storm, depth of 10.75 inches at elevation of 200- feet, unless another methodology has been agreed upon by Placer County. The project proponent shall either provide permanent on-site retention or participate in a regional stormwater retention program, if established by the County, by paying retention mitigation fees including maintenance and operation costs, as deemed appropriate, to mitigate the project's increases to stormwater volume. If interim retention facilities are constructed within the PRSP and net SAP areas on parcels zoned for development, the development project would also be subject to payment of the retention fee, in order to fund construction of the ultimate regional retention facility. Retention and detention facilities shall be designed in accordance with the requirements of the Placer County Storm Water Management Manual standards that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division, and shall be shown in the improvement plans. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.				
Mitigation Measure 4.9-3a: Place staging areas away from dwellings and resources (Net SAP Area and PRSP Area) The improvement plans shall identify the stockpiling and/or vehicle staging areas with locations as far as practical from existing dwellings and protected resources in the net SAP and PRSP areas. The locations of stockpiling and/or staging areas shall be reviewed and approved by the County prior to initiating construction.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	With submittal of Improvement Plans	Satisfied with approval of Improvement Plans and during construction inspection
Mitigation Measure 4.9-3b: Place staging areas away from dwellings and resources (Other Supporting Infrastructure) The County shall work with the project proponent to coordinate with the City of Roseville to make sure that stockpiling and/or vehicle staging, as identified on improvement plans, is located as far as practical from existing dwellings and protected areas, and that the locations are consistent with City of Roseville standards.	Other Supporting Infrastructure	City of Roseville (Placer County Engineering and Surveying Division to coordinate with City)	Prior to initiating ground-disturbing construction at the Pleasant Grove Retention Facility and off-site transportation and utility improvement areas	Satisfied with verification that stockpiling and staging areas are appropriately sited

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.9-4a: Provide evidence of Waste Discharge Identification number (Net SAP Area and PRSP Area) Before construction begins, the project proponent shall provide evidence to the Placer County ESD of a Waste Discharge Identification number generated from SWRCB's Stormwater Multiple Application and Report Tracking System. This document will serve as the RWQCB approval or permit under the NPDES construction stormwater quality permit.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	Before construction begins	Satisfied before construction begins
Mitigation Measure 4.9-4b: Design project to meet source control requirements of MS4 Permit (Net SAP Area and PRSP Area) The project is located in the permit area covered by Placer County's Small Municipal Separate Storm Sewer System (MS4) Permit (SWRCB NPDES), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of the MS4 Permit. The project proponent shall implement permanent and operational source control measures as applicable. Source control measures shall be designed for pollutant-generating activities or sources consistent with recommendations from the California Stormwater Quality Association's *Stormwater Best Management Practice Handbook: New Development and Redevelopment*, or an equivalent manual, and shall be shown on the improvement plans. The project is also shall implement LID standards designed to reduce runoff, treat stormwater, and provide baseline hydromodification management as outlined in the *West Placer Storm Water Quality Design Manual*.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	With submittal of Improvement Plans	Satisfied with approval of Improvement Plans
Mitigation Measure 4.9-4c: Design project to meet impervious surface and flow requirements of MS4 Permit (Net SAP Area and PRSP Area) In accordance with the NPDES Phase II MS4 Permit, the project is a Regulated Project that creates and/or replaces 5,000 square feet or more of impervious surface. The project proponent shall submit a final SWQP either within the final drainage report or as a separate document that identifies how this project would meet the Phase II MS4 permit obligations. Site design measures, source control measures, and LID standards, as necessary, shall be incorporated into the design and shown in the improvement plans. In addition, in accordance with the Phase II MS4 permit, projects creating and/or replacing 1 acre or more of impervious surface (excepting projects that do not increase the extent of impervious surface area over the preproject condition) are also required to demonstrate hydromodification management of stormwater such that the amount of postproject runoff is kept to equal to or below preproject flow rates for the 2-year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in postproject flows that mimic preproject conditions.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	With submittal of Improvement Plans	Satisfied with approval of Improvement Plans

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.9-4d: Design off-site transportation and utility improvements to meet source control and impervious surface requirements (Off-site Transportation and Utility Improvements) The County shall work with the project proponent to coordinate with the City of Roseville to verify that design of off-site transportation and utility improvements meet NPDES Phase II MS4 permit requirements, as well as any additional City of Roseville standards for protecting water quality during project operation.	Off-site Transportation and Utility Improvements	City of Roseville (Placer County Engineering and Surveying Division to coordinate with City)	Prior to finalizing design	Satisfied with approval of final design
Mitigation Measure 4.9-5a: Delineate 100-year floodplain on subdivision maps (Net SAP Area and PRSP Area) The improvement plans and informational sheet(s) filed with the appropriate small lot final subdivision map(s) shall show the limits of the future, unmitigated, fully developed 100-year floodplain (after grading) for University Creek and its tributaries and designate the limits as a building setback line.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	With submittal of Improvement Plans and Final Map informational sheet(s)	Satisfied with approval of Improvement Plans and Final Map informational sheet(s)
Mitigation Measure 4.9-5b: Demonstrate that all building pad elevations are a minimum of 2 feet above the 100-year floodplain line (Net SAP Area and PRSP Area) The improvement plans and informational sheet(s) filed with the appropriate small lot final subdivision map(s) shall show finished building pad elevations to be a minimum of 2 feet above the 100-year floodplain line (or finished floor 3 feet above the 100-year floodplain line). The final pad certification letter shall be certified by a California registered civil engineer or licensed land surveyor and submitted to the Placer County ESD. This certification shall be done before construction of the foundation or at the completion of final grading, whichever comes first. No construction is allowed until the certification has been received by ESD and approved by the floodplain manager. Benchmark elevation and location shall be shown on the improvement plans and informational sheet(s) to the satisfaction of Development Review Committee.	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division and the Design Review Committee	With submittal of Improvement Plans and Final Map informational sheet(s)	Certification shall be done before construction of the foundation or at the completion of final grading, whichever comes first
Mitigation Measure 4.9-5c: Prohibit grading within the 100-year floodplain (Net SAP Area and PRSP Area) No grading activities of any kind may take place within the 100-year floodplain of the stream/drainageway unless approved and analyzed as part of this project. All work shall conform to provisions of the County Flood Damage Prevention Regulations (Section 15.52, Placer County Code). The location of the 100-year floodplain shall be shown on the Improvement Plans. Prior to Improvement Plan approval and if required by the County Floodplain Administrator, the project proponent shall obtain from FEMA, a Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision based on Fill (CLOMR-F) for fill within a Special Flood Hazard Area. A copy of the letter shall be provided to the Engineering and Surveying Division prior to approval of Improvement Plans. A Letter of Map Revision (LOMR), or a Letter of Map Revision	Net SAP Area and PRSP Area	Placer County Engineering and Surveying Division	With submittal of Improvement Plans	Prior to Improvement Plan approval and during construction inspection

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
based on Fill (LOMR-F) from FEMA shall be provided to the Engineering and Surveying Division prior to acceptance of project improvements as complete, or as otherwise approved for the Sac State–Placer Center site.				
4.10 Land Use				
Mitigation Measure 4.10-2: Require odor control measures for specific plans (PRSP Area and Net SAP Area) Placer County shall require that project proponents include, as part of proposed specific plans, master plans, or development agreements, measures that would improve land use compatibility with the WRSL by reducing land use conflicts related to undesirable odor from the WRSL. Measures that can be included in specific plans, master plans, or development agreements include, but are not limited to: ◢ Building Design ◤ Locate air intake on the side of the building that is most-distant from the WRSL. ◤ Require a level of air filtration that exceeds Title 24 standards. ◤ Overall site orientation ◢ Landscape Design ◤ Require a landscape buffer zone on all land uses adjacent to the WRSL. ◤ Install sound walls or other solid vertical structures between residences and WRSL. ◢ Deed Notification ◤ Require written disclosures to initial and subsequent prospective buyers, lessees, and renters of those properties, particularly residential buyers, with information that their respective properties would potentially be subject to objectionable odors from a known nearby odor source. While this specific action would not eliminate complaints, it may reduce the frequency of complaints by those living or working closest to the landfill. The County shall verify that these measures have been incorporated into proposed specific plans, master plans, or development agreements in order to reduce to the degree feasible the potential for land use incompatibility.	Net SAP Area and PRSP Area	Placer County Planning Services Division and Environmental Engineering Division	During preparation of proposed specific plans, master plans, or development agreements	Satisfied with approval of Improvement Plans and/or recordation of Final Map, as applicable

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
4.11 Noise				
Mitigation Measure 4.11-1: Implement construction-noise reduction measures for daytime or nighttime construction (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville to ensure that construction activities that will take place in the vicinity of sensitive land uses (i.e., places where people sleep, reside, or work), comply with the appropriate noise reduction measures, such that noise levels do not exceed City of Roseville noise standards. Appropriate noise-reducing measures shall be determined at the time of grading/improvement plan submittal and may include, but not be limited to, specific measures included in SAP Program N-4. Implementation of noise-reducing measures would be the responsibility of the project construction manager or contractor.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division and Placer County construction inspectors to coordinate with City)	Determine appropriate noise-reducing measures at the time of grading/improvement plan submittal	Implement construction-noise reduction measures continuously during construction
Mitigation Measure 4.11-4a: Conduct site-specific noise study (Net SAP Area and PRSP Area) To prevent future sensitive land uses from disturbance during the sensitive times of the day, project proponents of a residential land use or a structure containing residential units shall, before approval of small-lot tentative maps, provide to the County a site-specific noise study prepared by a qualified acoustical engineer addressing interior and exterior noise levels at sensitive land uses. The noise study shall consider the types of land uses being proposed in the same building or in the vicinity as the residential units in a mixed-use structure and existing noise sources adjacent to the proposed structure. The noise study shall confirm, using approved calculation methodologies, that building design and materials are sufficient to maintain a maximum 45 dB L_{dn} /CNEL interior noise level, with windows closed, in residential units given the reasonably foreseeable noise generation sources within the building, and existing noise sources adjacent to the building. If the study shows such standards would not be met with the design as proposed, the project proponent shall implement recommendations of the study that are shown to achieve the standards.	Net SAP Area and PRSP Area	Placer County Planning Services Division and Placer County construction inspectors	Before approval of small-lot tentative maps	Satisfied with approval of small lot tentative maps
Mitigation Measure 4.11-4b: Reduce exposure to new sensitive land uses from the existing Roseville Power Plant 2 (PRSP Area) ◢ Before approval of small-lot tentative maps, the project proponent shall demonstrate that the building occupants of new residential or other sensitive land use within the PRSP area are not exposed to noise levels from the RPP2 that exceed Placer County land use compatibility standards (e.g., 60 dBA L_{dn}/CNEL for residential uses), daytime and nighttime noise limits for sensitive receptors (i.e., 45 dBA L_{eq}/65 dBA L_{max} [night], 55 dBA L_{eq} /70 dBA L_{max} [day]). ◢ If achievement of the Placer County noise standards cannot be met by providing adequate setback of at least 590 feet from the RPP2 (i.e., distance at which nighttime L_{eq} standard is met), then the County shall require the developer to construct, at developer's cost, a sound wall between the existing RPP2 and any new sensitive receptors. The wall design shall be coordinated with the City of Roseville. The wall or a combination of wall and setbacks, shall result in achievement of Placer County noise standards.	PRSP Area	Placer County Planning Services Division	Before approval of small-lot tentative maps	Satisfied before approval of small lot tentative maps

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.11-5a: Reduce noise levels associated with new, expanded, or extended roads (Net SAP Area and PRSP Area) Before finalizing roadway design for roadway expansion or new roadway construction, a design-level acoustical study shall be prepared to identify specific roadway design considerations, which shall be incorporated into final road design and approved by Placer County for roadways that result in a substantial increase in noise identified by Tables 4.11-12, 4.11-13, and 4.11-14. Roadway segments outside of Placer County are excluded (Fiddyment Road extension, Foothills Boulevard extension, and Woodcreek Oaks Boulevard extension). The following design features shall be considered: ◢ Roadway design shall provide sufficient setback between occupied structures that are defined as sensitive land uses by Placer County (or planned future sensitive land uses) and the roadway to minimize noise exposure to the extent feasible. ◢ In locations where setback is not feasible to reduce noise levels at existing or planned future sensitive receptors, roadway design shall incorporate quiet pavement types such as rubberized asphalt concrete (RAC) achieving at least a 4-dB decrease in traffic noise where feasible. ◢ Where existing sensitive receptors are located such that neither setback, nor quiet pavement, can reduce traffic noise from new or expanded roads associated with the project, the County shall coordinate with property owners of the existing residences regarding installation of sound walls along property lines to minimize traffic noise to meet exterior noise standards (city or County, as applicable) and, if necessary to meet the 45-dBA interior noise standards, upgrading windows that face the new or extended roadway.	Net SAP Area and PRSP Area	Placer County Planning Services Division and ESD	Before finalizing roadway design for roadway expansion or new roadway construction	Satisfied before finalizing roadway design for roadway expansion or new roadway construction
Mitigation Measure 4.11-5b: Reduce noise levels associated with new, expanded, or extended roads (Other Supporting Infrastructure) The County shall coordinate with the City of Roseville to ensure that, for new roadways or roadways expansions that would result in substantial increases in noise (i.e., 5 dB or more), a design-level acoustical study is conducted and available design measures are incorporated to reduce noise impacts at sensitive receptors. Roadways that would result in substantial increases in noise include Fiddyment Road, Woodcreek Oaks Boulevard, and Foothills Boulevard extensions. Specific design considerations may include those specified in Mitigation Measure 4.11-5b.	Other Supporting Infrastructure	City of Roseville (Placer County Planning Services Division to coordinate with City)	Before finalizing roadway design for roadway expansion or new roadway construction	Satisfied before finalizing roadway design for roadway expansion or new roadway construction
Mitigation Measure 4.11-5c: Reduce transportation noise levels within the PRSP area (PRSP Area) Before approval of small-lot tentative maps, the project proponent shall conduct a design-level acoustic study for noise-sensitive land uses within the noise contours identified below in Table 4.11-15 and Exhibit 4.11-3, and 3,625 feet from the UPRR tracks. The noise study shall provide recommendations to ensure that specific site design and building placement do not exceed the exterior noise standards (identified in Table 4.11-15 for each applicable land use) and the 45 dBA L_{dn}/CNEL interior noise standard. Recommendations shall include, but shall not be limited to, the following measures:	PRSP Area	Placer County Planning Services Division	Before approval of small-lot tentative maps	Satisfied with approval of small-lot tentative maps

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring

- Noise-sensitive outdoor use areas (e.g., backyards, common areas, outdoor dining, playgrounds) shall be located as far away from adjacent roadways and/or railroad tracks as possible and buildings shall be oriented to shield noise-sensitive spaces whenever possible.
- If noise standards cannot feasibly be met through site design measures identified above, noise barriers shall be placed between the transportation noise source and the receptor. Noise barriers shall be constructed of concrete cinderblock (or other solid material of similar density), shall be designed consistent with PRSP design guidelines, and shall completely block line-of-sight between the noise source and receptor such that traffic noise levels are reduced by up to 10 dB.

Table 4.11-15 Distance from Roadway Centerline to Relevant Noise Contours

(ID) Road Name	From	To	ADT	L_{dn}/CNEL @ 100 Feet	Distance to Contour (L_{dn}/CNEL)			
					75 dBA (Park, Playground, Golf Course)	70 dBA (Restaurant w/ Outdoor Seating)	65 dBA (Hotel, Motel, Child/ Adult Day Care, Church)	60 dBA (Resi-dential)
(184) Foothills Blvd	Athens Ave	Sunset Blvd	18,300	67.4	19	42	90	194
(300) Foothills Blvd	Placer Parkway	Campus Park Blvd	15,500	67.1	17	37	81	174
(303) Foothills Blvd	Campus Park Blvd	Sunset Blvd	22,200	67.0	22	48	104	223
(304) Sunset Blvd	Foothills Blvd	Industrial Ave	28,000	68.5	26	56	120	258
(305) Campus Park Dr	Foothills Blvd	East	8,800	64.6	12	26	55	119
(306) Campus Park Dr	Foothills Blvd	University Village Dr	12,800	65.3	15	33	71	154
(307) University Village Dr	Campus Park Blvd	Sunset Blvd	18,500	66.9	20	42	91	197
(308) University Village Dr	Sunset Blvd	Foothills Blvd	2,100	58.4	5	10	21	46
(309) Sunset Blvd	University Village Dr	College Park Dr	26,200	68.5	25	53	115	248
(310) Sunset Blvd	Foothills Blvd	University Village Dr	17,600	66.7	19	41	88	190
(311) Foothills Blvd	Sunset Blvd	University Village Dr	9,100	63.1	12	27	57	123
(312) Foothills Blvd	University Village Dr	College Park Dr	7,200	62.1	11	23	49	105

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures									Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
(314) College Park Dr	Foothills Blvd	Westbrook Blvd	15,300	66.1	17	37	80	173				
(315) Woodcreek Oaks Blvd	College Park Dr	Northpark Dr	36,400	69.9	31	67	143	309				
(316) College Park Dr	Sunset Blvd	Woodcreek Oaks Blvd	24,200	68.1	24	51	109	235				
(317) Campus Park Dr	Fiddyment Rd	Foothills Blvd	21,100	67.5	21	46	100	215				
(318) Sunset Blvd	Fiddyment Rd	College Park Dr	17,300	66.7	19	41	87	188				
(319) Fiddyment Rd	Placer Pkwy	Campus Park Blvd	20,900	66.7	21	46	99	214				
(320) Fiddyment Rd	Campus Park Blvd	Sunset Blvd	44,900	70.0	36	77	166	357				
(321) Fiddyment Rd	Sunset Blvd	Settlers Ridge Dr	53,000	70.8	40	86	185	398				
(324) Campus Park Dr	Fiddyment Rd	Maple Park Dr	21,000	67.5	21	46	99	214				
(325) Sunset Blvd	Fiddyment Rd	Maple Park Dr	8,100	64.2	11	24	52	113				
(326) Maple Park Dr	Campus Park Blvd	Sunset Blvd	7,900	64.1	11	24	52	111				
(327) Campus Park Dr	Maple Creek Cir	C St	3,800	61.0	7	15	32	68				
(328) Sunset Blvd	Maple Creek Cir	C St	4,500	61.7	8	16	35	76				
(329) C St	Campus Park Blvd	Sunset Blvd	1,100	55.6	3	6	14	30				
(330) Campus Park Dr	C St	B St	3,800	61.0	7	15	32	68				
(331) Sunset Blvd	C St	B St	2,800	59.6	6	12	26	56				
(332) Campus Park Dr	B St	A St	1,000	55.2	3	6	13	28				
(333) Sunset	B St	A St	2,800	59.6	6	12	26	56				

Notes: ADT= Average Daily Trips; L_{dn} = day-night noise level; CNEL= community equivalent noise level; dBA= A-weighted decibel

Source: Modeled by Ascent Environmental 2017

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
4.13 Public Services				
Mitigation Measure 4.13-1a: Create or annex into a CFD for fire protection and emergency response (Net SAP Area and PRSP Area) Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a Community Facilities District (CFD), County Service Area (CSA) Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding supplemental revenue for operations, training, maintenance, and personnel costs. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for fire protection services, infrastructure, and equipment is in place to provide adequate fire safety services to the net SAP area and PRSP area during all stages of development. The staffing ratios in Table 4.13-5 [in the Draft EIR] shall be maintained for the net SAP and PRSP areas concurrent with demand.	Net SAP Area and PRSP Area	Placer County Executive Office in coordination with Placer County Planning Services Division	Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first	Satisfied with recordation of Final Subdivision Maps or approval of Improvement Plans, for each property, whichever occurs first
Mitigation Measure 4.13-1b: Fire stations (Net SAP Area and PRSP Area) A minimum of two fire stations are needed to serve the net SAP and PRSP areas. Both fire stations will be located within the SAP/PRSP area and shall be fully funded and equipped. The first fire station already exists in the net SAP area and is known as Station #77. PRSP Parcel PR-71 has been identified for the second station or any parcel within the PRSP area with a General Commercial, Commercial Mixed Use, or Campus Park land use designation. The fire stations will be constructed as needed to serve development and maintain staffing ratios. Placer County Fire anticipates that the second fire station will be needed at approximately 25 percent buildout of the PRSP. The second fire station's location, design, and construction will be identified in coordination with Placer County Fire, and the fire station will be constructed as its necessity is determined by the County based upon development and staffing ratios. The timing and triggers for construction of the fire station are outlined in the PRSP Development Agreement. Funding shall be provided pursuant to Mitigation Measure 4.13-1a.	Net SAP Area and PRSP Area	Placer County Executive Office in coordination with Placer County Planning Services Division and Placer County Fire Department	Funding provided prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first; construction to occur as necessary to maintain staffing ratios	Satisfied with recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first; County will review staffing ratios with each application and will initiate construction of fire stations when staffing ratios approach the standard
Mitigation Measure 4.13-2: Create or annex into a CFD for law enforcement services (Net SAP Area and PRSP Area) Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a CFD, CSA Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding supplemental revenue for operations, training, maintenance, and personnel costs. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for law enforcement services, infrastructure, and equipment is in place to provide adequate law enforcement services to the net SAP area and PRSP area during all stages of development.	Net SAP Area and PRSP Area	Placer County Executive Office in coordination with Placer County Planning Services Division	Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first	Satisfied with recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.13-4: Create or annex into a CFD for library services (Net SAP Area and PRSP Area) Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a CFD, CSA Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding supplemental revenue for library facilities, operations, and maintenance. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for library services is in place to provide adequate library services to the net SAP area and PRSP area during all stages of development. The County will provide interim library services through one or more means, including usage of the Bookmobile to provide temporary library services, establishment of a satellite library office within SAP or immediately adjacent to, or establishment of a satellite office at 1000 Sunset Boulevard, Rocklin, CA 95677 or other equivalent means beginning at 25 percent buildout of the PRSP or as otherwise determined by the County. These interim library services may become permanent means to provide library services to the plan area if a regional library is not constructed to serve the plan area or a joint partnership with the University has not been agreed to, to provide library services to PRSP before buildout of 75 percent of the DUE's in the plan area or as determined by the County.	Net SAP Area and PRSP Area	Placer County Executive Office in coordination with Placer County Planning Services Division	Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first	Satisfied with recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first
Mitigation Measure 4.13-8: Create or annex into a CFD for road maintenance (Net SAP Area and PRSP Area) Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first, the developer shall create a CFD, CSA Zone of Benefit, annex to an existing CSA Zone of Benefit, or combination thereof, for the purposes of funding road maintenance. The chosen mechanism shall include a landowner-approved special tax of an adequate amount, or other financing mechanism acceptable to the County, to ensure that a funding mechanism for road maintenance is in place to provide adequate maintenance of roads within the net SAP area and PRSP area during all stages of development.	Net SAP Area and PRSP Area	Placer County Department of Public Works in coordination with Planning Services Division	Prior to either the recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first	Satisfied with recordation of Final Subdivision Maps or the approval of Improvement Plans, for each property, whichever occurs first
4.14 Transportation and Circulation				
Mitigation Measure 4.14-1a: Widen Sunset Boulevard to four lanes from PRSP boundary to Placer Corporate Drive/South Loop Road (PRSP Area) The Placer County Countywide CIP (Placer County 2018c) includes funding for the widening of Sunset Boulevard to four lanes from Cincinnati Avenue to SR 65. Prior to issuance of building permits, project proponents of development projects within the PRSP area, shall pay the applicable countywide traffic impact fees that are in effect in this area (Sunset District) pursuant to the applicable ordinances and resolutions, which will provide funding towards this improvement. The constructing party shall be eligible for fee credits for the applicable countywide traffic impact fees, as determined by DPWF.	PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits for development projects within the PRSP area	Satisfied with issuance of building permits for development projects within the PRSP area

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.14-1b: Construct extension of Foothills Boulevard as a four-lane arterial between PRSP area and its current northern terminus in City of Roseville (Net SAP Area and PRSP Area) This improvement is not fully funded through a known fee program. Placer County proposes to include this improvement in an update to the Placer County Countywide CIP and countywide traffic impact fee, which will be adopted concurrently with the PRSP and SAP. With the inclusion of this improvement into the Countywide CIP, project proponents of future development projects within the SAP area, including the PRSP area, shall pay the applicable countywide traffic impact fees prior to the issuance of building permits, which will provide funding for this improvement. The constructing party shall be eligible for fee credits for the applicable countywide traffic impact fees, as determined by DPWF.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits for development projects within the SAP area, including the PRSP area	Satisfied with issuance of building permits for development projects within the SAP area, including the PRSP area
Mitigation Measures Implement Mitigation Measures 4.14-1a (PRSP Area) and 4.14-1b (Net SAP Area and PRSP Area)	Net SAP Area and PRSP Area	See Mitigation Measures 4.14-1a and 4.14-1b, above	See Mitigation Measures 4.14-1a and 4.14-1b, above	See Mitigation Measures 4.14-1a and 4.14-1b, above
Mitigation Measure 4.14-2a: Contribute fair share of feasible physical improvements (Net SAP Area and PRSP Area) Project proponents of future development projects within the SAP area, including the PRSP area, shall be responsible for the project's fair share of all feasible physical improvements necessary and available to reduce the severity of the project's significant impacts to traffic operations at study intersections in Placer County, as identified in the traffic analysis above, consistent with the policies and exceptions set forth in the Transportation and Circulation Element of the Placer County General Plan. The project proponent's contribution towards such improvements may take any, or some combination, of the following forms: ◢ For intersections within or adjacent to the boundaries of the SAP area, including the PRSP area, construction of intersection improvements which may be eligible for fee credits and/or reimbursement, coordinated by the County, from other fee-paying development projects with respect to roadways and intersections that would also serve fee-paying development projects other than the SAP and PRSP. ◢ Construction of roadway and intersection improvements outside the boundaries of the SAP area but within unincorporated Placer County, subject in some instances to future reimbursement, coordinated by the County, from other fee-paying development projects where the intersection improvements at issue would also serve fee-paying development projects other than the SAP and PRSP.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Fee payment prior to issuance of building permits for development projects within the SAP area, including the PRSP area, or submittal of improvement plans if constructing improvements	Satisfied with payment of fees or completion of improvements, as applicable

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Payment of applicable countywide traffic impact fees to Placer County in amounts that constitute the SAP's and PRSP's fair share contributions to the construction of intersection improvements to be built within unincorporated Placer County, consistent with the Placer County Countywide CIP and as determined by DPWF. This includes improvements that would be included in an update to the Placer County Countywide CIP and countywide traffic impact fee that the County will adopt concurrently with the SAP and PRSP.				
Mitigation Measure 4.14-2b: Pay applicable City/County Baseline Road fee (Net SAP Area and PRSP Area) Consistent with Mitigation Measure 4.14-2a, project proponents of future development projects within the SAP area shall pay the applicable City/County Baseline Road fee, which would provide funding for constructing improvements to Baseline Road. This includes widening Baseline Road to 4 lanes (2 eastbound and 2 westbound) through the Locust Road intersection before buildout of the SAP.	Net SAP Area and PRSP Area	See Mitigation Measure 4.14-2a, above	See Mitigation Measure 4.14-2a, above	See Mitigation Measure 4.14-2a, above
Mitigation Measure 4.14-2c: Adopt update to Placer County Countywide CIP and countywide traffic impact fee (Net SAP Area and PRSP Area) Consistent with Mitigation Measure 4.14-2a, the County shall adopt an update to the Placer County Countywide CIP and countywide traffic impact fee concurrently with the SAP and PRSP to include installing traffic signals and capacity-enhancing improvements currently not included in any known fee program at the following intersections: ◢ Industrial Avenue / Placer Corporate Drive (net SAP area), ◢ Industrial Avenue / South Loop Road (net SAP area), ◢ Sunset Boulevard / South Loop Road/Placer Corporate Drive (net SAP and PRSP areas), ◢ Sunset Boulevard West / Fiddyment Road (net SAP and PRSP areas), ◢ Athens Avenue / Fiddyment Road (net SAP and PRSP areas), and ◢ Athens Avenue / Foothills Boulevard North (net SAP and PRSP areas). Prior to issuance of building permits, project proponents of future development projects within the SAP area, including the PRSP area, shall pay the applicable countywide traffic impact fees, as determined by DPWF, which will provide funding for improvements at the above intersections.	Net SAP Area and PRSP Area	Placer County Department of Public Works	After adoption of the updated CIP and fee payment prior to issuance of building permits for development projects within the SAP area, including the PRSP area	Satisfied with adoption of the updated CIP and payment of applicable fees
Mitigation Measures Implement Mitigation Measures 4.14-1a (PRSP Area), 4.14-1b (Net SAP Area and PRSP Area), and 4.14-10 (Net SAP Area and PRSP Area).	Net SAP Area and PRSP Area	See Mitigation Measures 4.14-1a and 4.14-1b, above	See Mitigation Measures 4.14-1a and 4.14-1b, above	See Mitigation Measures 4.14-1a and 4.14-1b, above

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.14-3: Pay impact fees associated with signalized intersections in City of Roseville to Placer County (Net SAP Area and PRSP Area) Prior to building permit issuance, project proponents of individual development projects within the SAP area, including the PRSP area, shall pay impact fees to Placer County in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities and/or improvements at the following signalized intersections within the City of Roseville: ◢ Baseline Road / Fiddyment Road (net SAP and PRSP areas), ◢ Blue Oaks Boulevard / Crocker Ranch Road (net SAP area), ◢ Blue Oaks Boulevard / Fiddyment Road (net SAP and PRSP areas), ◢ Blue Oaks Boulevard / New Meadow Drive (net SAP area), ◢ Blue Oaks Boulevard / Diamond Creek Boulevard (net SAP and PRSP areas), ◢ Blue Oaks Boulevard / Foothills Boulevard (net SAP and PRSP areas), ◢ Blue Oaks Blvd / Woodcreek Oaks Boulevard (net SAP and PRSP areas), ◢ Cirby Way / Sunrise Avenue (net SAP area), ◢ Cirby Way / Foothills Boulevard (net SAP area), ◢ Cirby Way / Melody Lane (net SAP area), ◢ Cirby Way / Northridge Drive (net SAP area), ◢ Cirby Way / Riverside Avenue (net SAP and PRSP areas), ◢ Cirby Way / Vernon Street (net SAP area), ◢ Douglas Boulevard / Eureka Road (net SAP area), ◢ Douglas Boulevard / Rocky Ridge Drive (net SAP area), ◢ Douglas Boulevard/ Sunrise Avenue (net SAP area), ◢ Douglas Boulevard / East Roseville Parkway (net SAP and PRSP areas), ◢ Douglas Boulevard / Harding Boulevard (PRSP area), ◢ Douglas Boulevard / Sierra College Boulevard (net SAP area), ◢ Del Webb Boulevard / Village Green Drive / Fiddyment Road (net SAP area), ◢ Hayden Parkway (North) / Fiddyment Road (net SAP area), ◢ Hayden Parkway (South) / Fiddyment Road (net SAP area), ◢ Baseline Road / Main Street / Foothills Boulevard (net SAP area), ◢ Atkinson Road / Foothills Boulevard (net SAP area), ◢ Junction Boulevard / Foothills Boulevard (net SAP and PRSP areas),	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits	Satisfied with payment of fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Pleasant Grove Boulevard / Foothills Boulevard (net SAP and PRSP areas), ◢ Roseville Parkway / Galleria Boulevard (net SAP area), ◢ Fairway Drive / Pleasant Grove Boulevard (net SAP area), ◢ Pleasant Grove Boulevard / Fiddyment Road (net SAP and PRSP areas), ◢ Market Street / Pleasant Grove Boulevard (net SAP area), ◢ Pleasant Grove Boulevard / Roseville Parkway (net SAP area), ◢ Pleasant Grove Boulevard / Washington Boulevard (net SAP and PRSP areas), ◢ Pleasant Grove Boulevard / Woodcreek Oaks Boulevard (net SAP and PRSP areas), ◢ Roseville Parkway / Reserve Drive (net SAP area), ◢ Roseville Parkway / Taylor Road (net SAP area), ◢ Eureka Road / Roseville Parkway (net SAP area), ◢ Roseville Parkway / Washington Boulevard (net SAP area), ◢ S. Cirby Way / Old Auburn Road (net SAP area), ◢ Eureka Road / Sierra College Boulevard (net SAP and PRSP areas), ◢ Old Auburn Road / Sierra College Boulevard (net SAP and PRSP areas), ◢ Fairway Drive / Stanford Ranch Road (net SAP area), ◢ Baseline Road / Woodcreek Oaks Boulevard (net SAP and PRSP areas), ◢ Canevari Drive / Arsenault Drive / Woodcreek Oaks Boulevard (net SAP area), ◢ Pleasant Grove Boulevard / SR 65 SB Off-Ramp (net SAP area), ◢ I-80 WB Off-Ramp / Riverside Avenue (net SAP area), ◢ SR 65 NB On-Ramp / Stanford Ranch Road (net SAP area), ◢ Eureka Road / Taylor Road/I-80 Eastbound Off-Ramp (net SAP and PRSP areas), ◢ I-80 EB Off-Ramp / Orlando Avenue / Riverside Avenue (net SAP area), and ◢ Watt Avenue / Baseline Road (net SAP and PRSP areas). Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City. The County intends that its arrangement(s) with the City of Roseville and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole or in part by newly approved projects, (iii) changing cost calculations for the construction of needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Roseville regarding traffic mitigation fees to fund regional improvements. The implementation of improvements at the impacted intersections listed above vary by location based on the type of improvement, and whether the improvement is included in a known fee program. Therefore, the project's contribution toward such improvements may take one of the following forms: (a) The widening of Blue Oaks Boulevard to eight lanes from Woodcreek Oaks Boulevard to SR 65, as included in the City of Roseville CIP, would restore operations to an acceptable LOS C or better during the a.m. and p.m. peak hours at the following intersection. This improvement				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
is considered feasible because it is identified in the City of Roseville CIP, which is funded by the City of Roseville's Traffic Mitigation Fee (TMF). ◢ Blue Oaks Boulevard / Foothills Boulevard (net SAP and PRSP areas) (b) The capacity-enhancing improvements to the intersections listed below are included in the City of Roseville CIP, which is funded by the City of Roseville's TMF. These enhancements are considered feasible because they are funded through an adopted fee program. These improvements would restore operations to an acceptable LOS C or better for intersections that operate at LOS C or better under existing conditions. Similarly, these improvements would restore operations to the LOS under existing conditions or better for intersections that currently operate at an unacceptable LOS D, E, or F. ◢ Douglas Boulevard / Sierra College Boulevard (net SAP area) ◤ Widen southbound approach to accommodate a right-turn pocket ◢ Pleasant Grove Boulevard / Foothills Boulevard (PRSP) ◤ Modify the westbound approach to convert the outside left-turn lane to a third westbound through lane, resulting in 2 left-turn lanes, 3 through lanes, and 1 right-turn lane on the westbound approach ◢ Roseville Parkway / Galleria Boulevard (net SAP area) ◤ Widen the eastbound and westbound approaches to accommodate a fourth through lane ◢ Pleasant Grove Boulevard / Woodcreek Oaks Boulevard (PRSP area) ◤ Widen the eastbound approach to accommodate a third through lane ◢ Blue Oaks Boulevard / Washington Boulevard (net SAP area) ◤ Widen the eastbound and westbound approaches to accommodate a fourth through lane ◤ Widen the northbound approach to accommodate a second right-turn lane (c) The capacity-enhancing improvements to the intersections listed below are included in the City/County Baseline Road Fee Program. These improvements are considered feasible because they are funded through an adopted fee program. These improvements would restore operations to an acceptable LOS C or better during the a.m. and p.m. peak hours. ◢ Baseline Road / Fiddyment Road (PRSP area) ◤ Modify the eastbound approach to accommodate a second left-turn lane ◤ Modify the westbound approach to accommodate a second left-turn lane and third through lane ◤ Modify signal to provide right-turn overlap phase for the westbound, northbound, and southbound right-turn movements, and prohibit the conflicting U-turn movements				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Watt Avenue / Baseline Road (net SAP area) ◤ Widen the eastbound and westbound approaches to accommodate two through lanes ◤ Widen the westbound approach to accommodate two left-turn lanes (d) The capacity-enhancing improvements to the intersection listed below is included in the SPRTA fee program and the City of Roseville CIP, which is funded by the City of Roseville's TMF. These improvements are considered feasible because they are funded through an adopted fee program. These improvements would restore operations to an acceptable LOS C or better during the a.m. and p.m. peak hours. ◢ Eureka Road / Sierra College Boulevard (net SAP area) ◤ Widen the northbound and southbound approaches to accommodate a third through lane ◢ Old Auburn Road / Sierra College Boulevard (net SAP area) ◤ Widen the northbound and southbound approaches to accommodate a third through lane (e) Capacity-enhancing improvements to the intersections listed below are not included in any known fee program, including the City of Roseville's TMF program. These improvements would restore operations to an acceptable LOS C or better for intersections that operate at LOS C or better under existing conditions. Similarly, these improvements would restore operations to the LOS under existing conditions or better for intersections that currently operate at an unacceptable LOS D, E, or F. The following enhancements are necessary only to mitigate the traffic impacts for buildout of the SAP and are not necessary to mitigate traffic impacts from the buildout of the PRSP. ◢ Baseline Road / Fiddyment Road ◤ Widen the northbound approach to accommodate one left-turn lane, two through lanes, and a shared through/right-turn lane ◢ Blue Oaks Boulevard / Woodcreek Oaks Boulevard ◤ Widen the eastbound and westbound approaches to accommodate a fourth through lane, as identified in the City of Roseville's CIP for widening Blue Oaks Boulevard to eight lanes ◤ Restripe the southbound approach to accommodate three left-turn lanes, one through lane, and one through/right-turn lane ◤ Modify signal to provide right-turn overlap phases for the westbound and northbound right-turn movements, and prohibit the conflicting U-turn movements ◢ Cirby Way / Riverside Avenue ◤ Widen the eastbound approach to accommodate a third eastbound through lane ◤ Widen the northbound approach to accommodate a third left-turn lane				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◤ Widen the westbound approach to accommodate a third left-turn lane and right-turn pocket				
◤ Modify signal to provide right-turn overlap phases for the northbound and southbound right-turn movements, and prohibit the conflicting U-turn movements				
◢ Cirby Way / Vernon Street				
◤ Widen the eastbound approach to accommodate a right-turn pocket				
◤ Widen the southbound approach to accommodate a second right-turn lane				
◤ Modify signal to provide right-turn overlap phases for the southbound right-turn movement and prohibit the conflicting U-turn movements				
◢ Douglas Boulevard / Rocky Ridge Drive				
◤ Widen the northbound and southbound approaches to accommodate a third through lane				
◤ Modify signal to provide right-turn overlap phases for the northbound and southbound right-turn movements, and prohibit the conflicting U-turn movements				
◢ Douglas Boulevard / Sunrise Avenue				
◤ Widen northbound approach to accommodate a right-turn pocket				
◤ Widen the southbound approach to accommodate a second right-turn lane				
◢ Lead Hill Boulevard / N. Sunrise Avenue				
◤ Modify signal to provide right-turn overlap phases for the southbound and eastbound right-turn movements, and prohibit the conflicting U-turn movements				
◢ Pleasant Grove Boulevard / Fiddyment Road				
◤ Widen the southbound approach to accommodate a third through lane				
◤ Modify signal to provide right-turn overlap phases for the northbound, eastbound, and westbound right-turn movements, and prohibit the conflicting U-turn movements				
◢ Pleasant Grove Boulevard / Roseville Parkway				
◤ Widen the westbound approach to accommodate a fourth through lane				
◢ Pleasant Grove Boulevard / Washington Boulevard				
◤ Modify signal to provide right-turn overlap phases for the southbound and eastbound right-turn movements, and prohibit the conflicting U-turn movements				
◢ Roseville Parkway / Taylor Road				
◤ Widen the westbound approach to accommodate a fourth through lane				
◢ Eureka Road / Roseville Parkway				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◤ Restripe the eastbound approach to accommodate one left-turn pocket, one through lane, one through/right-turn lane, and one right-turn lane				
◢ Fairway Drive / Stanford Ranch Road				
◤ Widen the northbound approach to accommodate a third through lane				
◤ Modify signal to provide right-turn overlap phases for the northbound and eastbound right-turn movements, and prohibit the conflicting U-turn movements				
◢ Baseline Road / Woodcreek Oaks Boulevard				
◤ Restripe the northbound approach to accommodate one left-turn lane and one shared through/right-turn lane				
◤ Widen the eastbound approach to accommodate one left-turn lane, one through lane, and one shared through/right-turn lane				
◢ Douglas Boulevard / I-80 Westbound Off-Ramp				
◤ Widen the eastbound approach to accommodate a right-turn pocket				
◤ Widen the southbound approach to accommodate a second left-turn pocket				
◢ Pleasant Grove Boulevard / SR 65 Northbound Ramps				
◤ Widen the westbound approach to accommodate a second left-turn lane				
◤ Modify signal to provide right-turn overlap phases for the northbound and eastbound right-turn movements, and prohibit the conflicting U-turn movements				
◢ Pleasant Grove Boulevard / SR 65 Southbound Ramps				
◤ Widen the southbound approach to accommodate a second right-turn lane				
◤ Widen the eastbound approach to accommodate a right-turn lane				
◢ I-80 Westbound Off-Ramp / Riverside Avenue				
◤ Widen the northbound approach to accommodate a third through lane				
◤ Widen the westbound approach to accommodate a second right-turn lane				
◢ SR 65 Northbound Ramps / Stanford Ranch Road				
◤ Widen the northbound approach to accommodate a third through lane and two left-turn lanes				
◤ Widen the southbound approach to accommodate a right-turn lane				
◢ Eureka Road / Taylor Road/I-80 Eastbound Off-Ramp				
◤ Widen the eastbound approach to accommodate a third through lane				
◤ Widen the southbound approach to accommodate a second right-turn lane				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ I-80 Eastbound Off-Ramp/Orlando Avenue / Riverside Avenue ◤ Widen the northbound approach to accommodate a third through lane (f) Signal timing improvements to the intersections listed below would occur through the City of Roseville's regular maintenance of its traffic signals. Therefore, these improvements would require implementation by the City of Roseville. The signal timing improvements would include modification of timings to optimize use of the signal cycle to provide more green time allocation for critical movements. ◢ Blue Oaks Boulevard / Crocker Ranch Road (net SAP area) ◢ Blue Oaks Boulevard / Fiddyment Road (net SAP area) ◢ Blue Oaks Boulevard / Diamond Creek Boulevard (net SAP area) ◢ Cirby Way / Sunrise Avenue (net SAP area) ◢ Cirby Way / Foothill Boulevard (net SAP area) ◢ Douglas Boulevard / Eureka Road (net SAP area) ◢ Douglas Boulevard / Santa Clara Drive (net SAP area) ◢ Douglas Boulevard / Sierra Gardens Drive (net SAP area) ◢ Douglas Boulevard / E. Roseville Parkway (net SAP and PRSP areas) ◢ Del Webb Boulevard / Village Green Drive / Fiddyment Avenue (net SAP area) ◢ Baseline Road / Main Street / Foothills Boulevard (net SAP area) ◢ Junction Boulevard / Foothills Boulevard (net SAP and PRSP areas) ◢ Pleasant Grove Boulevard / Foothills Boulevard (net SAP area) ◢ Pleasant Grove Boulevard / Fiddyment Road (PRSP area) ◢ Pleasant Grove Boulevard / Washington Boulevard (PRSP area) ◢ Antelope Creek Drive / Galleria Boulevard (net SAP area) ◢ Fairway Drive / Pleasant Grove Boulevard (net SAP area) ◢ Pleasant Grove Boulevard / Woodcreek Oaks Boulevard (net SAP area) ◢ Roseville Parkway / Creekside Ridge Drive (net SAP area) ◢ Roseville Parkway / N. Sunrise Avenue (net SAP area) ◢ Roseville Parkway / Reserve Drive (net SAP area) ◢ Roseville Parkway / Washington Boulevard (net SAP area) ◢ S. Cirby Way / Old Auburn Road (net SAP area) ◢ Canevari Drive/Arsenault Drive / Woodcreek Oaks Boulevard (net SAP area)				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measures Implement Mitigation Measure 4.14-1b (Net SAP Area and PRSP Area).	Net SAP Area and PRSP Area	See Mitigation Measure 4.14-1b, above	See Mitigation Measure 4.14-1b, above	See Mitigation Measure 4.14-1b, above
Mitigation Measure 4.14-4: Pay impact fees associated with unsignalized intersections in City of Roseville to Placer County (Net SAP Area and PRSP Area) Prior to building permit issuance, project proponents of individual development projects within the SAP area shall pay impact fees to Placer County in amounts that constitute the SAP area's fair share contribution to the installation of traffic signals at the following unsignalized intersections within the City of Roseville. ◢ Woodcreek Oaks Boulevard / Northpark Drive (SAP area) ◢ Woodcreek Oaks Boulevard / Parkside Way (SAP area) ◢ Industrial Avenue / Alantown Drive (SAP area) As with Mitigation Measure 4.14-3, Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. Placer County shall hold these fees collected for improvements within the City of Roseville in trust for the expressed purpose of funding improvements to the specified facilities within the City. The County intends that its arrangement(s) with the City of Roseville and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits	Satisfied with payment of fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole or in part by newly approved projects, (iii) changing cost calculations for the construction of needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Roseville regarding traffic mitigation fees to fund regional improvements.				
Mitigation Measure 4.14-5: Pay impact fees associated with signalized intersections in City of Rocklin to Placer County (Net SAP Area and PRSP Area) Prior to building permit issuance, project proponents of individual development projects within the SAP area, including the PRSP area, shall pay impact fees to Placer County in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities and/or improvements in the City of Rocklin identified below. Placer County, in working with the City of Rocklin to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Rocklin to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Rocklin intersections. In reaching an accommodation with the City of Rocklin, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with just the City of Rocklin or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits	Satisfied with payment of fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
The County intends that its arrangement(s) with the City of Rocklin and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole or in part by newly approved projects, (iii) changing cost calculations for the construction of needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Rocklin regarding traffic mitigation fees to fund regional improvements. The necessary capacity enhancements to mitigate the increased delay caused by buildout of the SAP at the impacted intersections listed above would include: ◢ Sunset Boulevard / Lonetree Boulevard/W. Stanford Ranch Road: ◤ Widen the northbound approach to accommodate a third left-turn lane. ◤ Modify signal to provide right-turn overlap phase for the northbound, eastbound, and westbound right-turn movements, and prohibit the conflicting U-turn movements. ◢ Park Drive / Sunset Boulevard: ◤ Optimize the signal timing splits. ◢ Stanford Ranch Road / Sunset Boulevard: ◤ Modify signal to provide right-turn overlap phase for the southbound, eastbound, and westbound right-turn movements, and prohibit the conflicting U-turn movements, ◢ Sunset Boulevard / University Avenue/Atherton Drive: ◤ Widen Sunset Boulevard to 6 lanes from SR 65 to east of University Avenue, ◢ Pacific Street / Sunset Boulevard: ◢ Widen the eastbound approach to accommodate a second left-turn lane.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.14-6: Pay impact fees associated with unsignalized intersections in City of Lincoln to Placer County (Net SAP Area and PRSP Area) Prior to building permit issuance, project proponents of individual development projects within the SAP area shall pay impact fees to Placer County in amounts that constitute the SAP area's fair share contribution to the installation of a traffic signal at the Dowd Road / Moore Road intersection. Placer County, in working with the City of Lincoln to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Lincoln to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Lincoln intersections. In reaching an accommodation with the City of Lincoln, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with just the City of Lincoln or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. The County intends that its arrangement(s) with the City of Lincoln and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole or in part by newly approved projects, (iii) changing cost calculations for the construction of	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits	Satisfied with payment of fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Lincoln regarding traffic mitigation fees to fund regional improvements. Installation of a traffic signal at this intersection would improve operations to LOS B during the a.m. peak hour and LOS C during the p.m. peak hour. However, it is not included in any known fee program. This intersection is currently located within the unincorporated Placer County within the City of Lincoln sphere of influence. If this impact is triggered before annexation into the City of Lincoln, the County shall require the traffic signal to be installed prior to the issuance of building permits for further development that may further degrade operations at this intersection. If annexed into the City of Lincoln, this mitigation measure would require Placer County, on behalf of the project proponent, to negotiate in good faith with the City of Lincoln to identify the fair share funding contribution.				
Mitigation Measure 4.14-9: Pay impact fees to Placer County toward construction of improvements at highway ramp terminal intersections (Net SAP Area and PRSP Area) Prior to building permit issuance, project proponents of individual development projects within the SAP area, shall pay impact fees in effect to Placer County in amounts that constitute the SAP area's fair share contribution to the construction of improvements at the federal or state highway ramp terminal intersections identified below, which are needed in part because of the SAP. Placer County shall coordinate with their regional partners to modify an existing or adopt a new regional fee program to include the improvements identified that constitute the region's fair share toward the identified improvements. The necessary capacity enhancements to mitigate the increased delay caused by buildout of the SAP at the impacted intersections listed above would include: ◢ Pleasant Grove Boulevard / SR 65 Southbound Ramps: ◤ Widen the southbound approach to accommodate a second right-turn lane. ◤ Widen the eastbound approach to accommodate a right-turn lane. ◢ I-80 Westbound Off-Ramp / Riverside Avenue: ◤ Widen the northbound approach to accommodate a third through lane. ◤ Widen the westbound approach to accommodate a second right-turn lane. ◢ SR 65 Northbound Ramps / Stanford Ranch Road: ◤ Widen the northbound approach to accommodate a third through lane and two left-turn lanes. ◤ Widen the southbound approach to accommodate a right-turn lane.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits	Satisfied with payment of fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Eureka Road / Taylor Road/I-80 Eastbound Off-Ramp: ◤ Widen the eastbound approach to accommodate a third through lane. ◤ Widen the southbound approach to accommodate a second right-turn lane. ◢ I-80 Eastbound Off-Ramp/Orlando Avenue / Riverside Avenue: ◤ Widen the northbound approach to accommodate a third through lane. ◢ Sunset Boulevard / SR 65 Southbound Ramps: ◤ Modify the eastbound approach to accommodate a second eastbound right-turn pocket. ◢ Modify the southbound approach to accommodate a second left-turn pocket.				
Mitigation Measure 4.14-10: Contribute fair share of feasible physical improvements to freeway operations (Net SAP Area and PRSP Area) Prior to building permit issuance, project proponents of individual development projects within the SAP area shall be responsible for the project's fair share of all feasible physical improvements necessary and available to reduce the severity of the project's significant traffic impacts to freeway operations as identified in this traffic analysis consistent with the policies and exceptions set forth in the Transportation and Circulation Element of the Placer County General Plan. This may include any, or some combination of, the following forms: ◢ Payment of impact fees to the South Placer Regional Transportation Authority (SPRTA) in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities funded through fees collected by the SPRTA for Tier 1 and/or Tier 2 projects. This includes the following transportation projects that would directly improve operations on SR 65 and I-80: ◤ SR 65 Widening, including auxiliary lanes and a mainline mixed-flow or HOV travel lane ◤ I-80/SR 65 Interchange, and ◤ I-80/Rocklin Road Interchange ◢ Payment of other adopted and applicable regional impact fees that would provide improvements to freeway facilities that are affected by multiple jurisdictions, such as the Highway 65 JPA Fee, which provides funding for interchange improvements along SR 65. ◢ Placer County shall coordinate with their regional partners to modify an existing or adopt a new regional fee program to include the improvements identified that will constitutes the regions fair share toward the identified improvements. These improvements may include: ◤ Add ramp metering to high occupancy vehicle (HOV) lane entrance ramps on SR-65 ◤ Add auxiliary lanes to SR 65	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to issuance of building permits	Satisfied with payment of fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.14-12a: Demonstrate compliance with Placer County's Trip Reduction Program (Net SAP Area and PRSP Area) Prior to building permit issuance, a Transportation Demand Management Plan (TDMP) shall be submitted for DPWF review and must be approved by DPWF prior to Improvement Plan approval. Any non-residential development that is subject to the County Trip Reduction Ordinance (Chapter 10, Article 10.20, and Placer County Code) must prepare a TDMP. The number of employees at the site shall be determined by an employee-per-square-foot formula provided by DPWF in consultation with the project proponent.	Net SAP Area and PRSP Area	Placer County Department of Public Works and Planning Services Division	With submittal of design review application and/or Improvement Plan submittal	Satisfied with building permit issuance and Improvement Plan approval
Mitigation Measure 4.14-12b: Identify feasible steps to ensure that proposed development will comply with Placer County travel demand management policies, objectives, and performance requirements (Net SAP Area and PRSP Area) Prior to building permit issuance, the County shall require project proponents of future development projects within the SAP area, including the PRSP area, to identify feasible steps to ensure that the proposed development will comply with Placer County travel demand management (TDM) policies, objectives, and performance requirements. This may include: ◢ In conjunction with tentative subdivision approval, recorded codes, covenants and restrictions (CC&Rs) shall include provisions to: ◤ Guarantee adherence to Placer County travel demand management (TDM) policies and objectives. ◤ The perpetual implementation of TCMs regardless of property ownership. ◤ Inform all subsequent property owners of the requirements imposed herein. ◤ Identify potential consequences of nonperformance. ◤ Require that space use agreements (i.e., lease documents) shall also include provisions for the site as a means to inform and commit tenants to, and participate in, helping specific applicable developments meet Placer County TDM performance requirements. The TCMs identified as part of Mitigation Measures 4.14-12a and 4.14-12b would reduce VMT, as stated in the purpose of the Trip Reduction Ordinance (Article 10.20.020 of the Placer County Code) and supported by data compiled in the California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* document. Per Article 10.20.070 of the Placer County Code, the required TCMs may include the following: ◢ Designation of an employee transportation coordinator (ETC). ◢ Posting of ridesharing information, including: ◤ Posters or flyers encouraging the use of ridesharing and referrals to sources of information concerning ridesharing.	Net SAP Area and PRSP Area	Placer County Department of Public Works	With submittal of design review application and/or Improvement Plan submittal	Satisfied with building permit issuance

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
▼ The names and phone numbers of the ETC, transportation management association, and the County TCM coordinator. ◢ Posting (by employers) or providing to employers (by project controllers) of alternative transportation mode information, including: ▼ Current schedules, rates (including procedures for obtaining transit passes), and routes of mass transit service to the common work location or employment site. ▼ The location of all bicycle routes within at least a five-mile radius of the facility. ◢ Distribution of commuter matching service applications to employees (by employers) or to employers (by project controllers). The South Placer TMA and Caltrans Sacramento Rideshare each maintain regional computer databases to match commuters with common cross streets. Each provides rideshare applications to employers for distribution and then directly mails the match lists to the employees. The South Placer TMA provides rideshare matchlisting for destinations within Placer County, while Caltrans Sacramento Rideshare provides matchlisting for out-of-county destinations. Credit will be given if the ETC distributes the applications annually to all employees or employers, as applicable, and upon hiring to all new employees. ◢ Bicycle Parking Facilities. Unless there are overriding considerations specific to the employment site, sufficient bicycle parking must be supplied for employees. To receive credit, the employer must provide bicycle parking for all bicycle commuters, as determined by survey of employees, or two percent of employment, whichever is less. The bicycle parking facilities shall be, at minimum, Class II stationary bike racks. ◢ Preferential Carpool/Vanpool Parking. Unless there are overriding considerations specific to the employment site, parking spaces for four percent of employees must be painted "Carpool Parking" or "Vanpool Parking" and must be, with the exception of handicapped and customer parking, the spaces with most convenient access to the employee entrances. The ETC shall be responsible for monitoring the spaces. ◢ In addition to the required TCMs identified above, Article 10.20.070 of the Placer County Code identifies 18 optional TCMs and strongly encourages the application of other trip reduction measures that are not explicitly identified in the code.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.14-13a: Prepare a transit master plan for SAP area (Net SAP Area and PRSP Area) The County shall prepare a transit master plan for the SAP area, including the PRSP area. The transit master plan will be a County-led effort but may also be done in collaboration with PCTPA when PCTPA updates its Long-Range Transit Master Plan. Roseville Transit will also be consulted. The transit master plan shall identify how transit service will be delivered to the SAP and ensure that the service adequately serves transit demand in the SAP. Transit service could include but would not be limited to car-sharing programs, neighborhood electric vehicle systems, and free or low-cost monthly transit passes.	Net SAP Area and PRSP Area	Placer County Department of Public Works and, if applicable, in coordination Placer County Transportation Planning Agency and/or Roseville Transit	Prior to or during approval of small lot tentative map for development within the PRSP and prior to approval of any master plan or development agreement within the net SAP area	Satisfied with finalized transit master plan
Mitigation Measure 4.14-13b: Establish a Community Service Area (CSA) Zone of Benefit (ZOB) or annex into an existing CSA ZOB to fund transit services for the PRSP area (PRSP Area) Prior to Improvement Plan approval or Final Map recordation for subdivision projects, a Community Service Area (CSA) Zone of Benefit (ZOB) shall be established by the project proponent, or the project proponent shall annex into an existing CSA ZOB to fund the cost of transit services proposed by the Transit Master Plan. This will include any related capital costs for buses, passenger amenities, and facilities. The Transit Master Plan shall identify how transit service will be delivered to the PRSP area and will be prepared in collaboration with Placer County Transit and Placer County staff and submitted to the County for approval. The County shall review the Transit Master Plan and ensure that the proposed service and facilities adequately serves transit demand in the PRSP area. The County shall also require project proponents to either form a CSA ZOB or annex into an existing CSA ZOB to fund the cost of transit services that are proposed by the Transit Master Plan.	PRSP Area	Placer County Department of Public Works	Prior to Improvement Plan approval or Final Map recordation for subdivision projects	Satisfied with Improvement Plan approval or Final Map recordation for subdivision projects
Mitigation Measures Implement Mitigation Measures 4.14-2a (Net SAP Area and PRSP Area) and 4.14-2c (Net SAP Area and PRSP Area).	Net SAP Area and PRSP Area	See Mitigation Measures 4.14-2a and 4.14-2c, above	See Mitigation Measures 4.14-2a and 4.14-2c, above	See Mitigation Measures 4.14-2a and 4.14-2c, above
Mitigation Measure 4.14-15a: Pay impact fees to Placer County toward widening Sunset Boulevard to six lanes from PRSP area to SR 65 (PRSP Area) Prior to building permit issuance, project proponents of individual development projects within the PRSP area shall pay impact fees to Placer County, as determined by DPWF, in amounts that constitute the PRSP's fair share towards widening Sunset Boulevard to 6 lanes from the PRSP area to SR 65.	PRSP Area	Placer County Department of Public Works	Prior to building permit issuance	Satisfied with payment of fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.14-15b: Require dedication of right of way to widen Fiddyment Road to six lanes from Athens Avenue to E. Catlett Road (Net SAP Area) Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area shall dedicate sufficient right-of-way to widen Fiddyment Road to 6 lanes from Athens Avenue to E. Catlett Road in the future.	Net SAP Area	Placer County Department of Public Works	Prior to Improvement Plan approval or Final Map recordation for subdivision projects	Satisfied prior to Improvement Plan approval or Final Map recordation for subdivision projects
Mitigation Measure 4.14-15c: Require dedication of right-of-way to widen Sunset Boulevard to eight lanes from Placer Corporate Drive/South Loop Road to SR 65 (Net SAP Area) Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area shall dedicate sufficient right-of-way to widen Sunset Boulevard to 8 lanes from Placer Corporate Drive/South Loop Road to SR 65 in the future. Any development proposed on parcels affected by the future 8 lane facility shall be required as a condition of approval to provide an irrevocable offer of dedication to Placer County for a highway easement to accommodate the future 8 lane roadway improvements.	Net SAP Area	Placer County Department of Public Works	Prior to Improvement Plan approval or Final Map recordation for subdivision projects	Satisfied with Improvement Plan approval or Final Map recordation for subdivision projects
Mitigation Measure 4.14-15d: Preserve right-of-way on major arterials in the unincorporated County to accommodate forecasted ADT levels (Net SAP Area and PRSP Area) In addition to the widening and preservation of right-of-way identified in Mitigation Measures 4.14-15a through 4.14-15c, Placer County shall preserve right-of-way on major arterials in the unincorporated County to accommodate the forecasted ADT levels with buildout of the SAP. Prior to Improvement Plan approval or Final Map recordation for subdivision projects, project proponents of individual development projects within the SAP area, including the PRSP area, shall provide an irrevocable offer of dedication to Placer County for highway easements as necessary to accommodate the future roadway improvements. This includes: ◢ Fiddyment Road: Roseville city limits to Sunset Area Plan boundary – 6 lanes, ◢ Foothills Boulevard: Sunset Boulevard to Athens Avenue – 8 lanes, and ◢ Dowd Road: Sunset Boulevard West to Athens Avenue – 6 lanes	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to Improvement Plan approval or Final Map recordation for subdivision projects	Satisfied with Improvement Plan approval or Final Map recordation for subdivision projects
Placer County shall monitor development conditions in the SAP area, including the PRSP area, using dwelling unit equivalents. When dwelling unit equivalents exceed the amount analyzed in the cumulative plus PRSP plus SAP (20-year project) scenario, the County shall implement a traffic monitoring program that at a minimum includes: ◢ Fiddyment Road: Roseville city limits to Sunset Area Plan boundary, ◢ Foothills Boulevard: Sunset Boulevard to Athens Avenue, and ◢ Dowd Road: Sunset Boulevard West to Athens Avenue.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Traffic monitoring program implemented when dwelling unit equivalents exceed the amount analyzed in the cumulative plus PRSP plus SAP (20-year project) scenario; County will monitor dwelling unit equivalents	Monitoring to occur annually after dwelling unit equivalents are exceeded

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measures Implement Mitigation Measures 4.14-2a and 4.14-2c (Net SAP Area and PRSP Area).	Net SAP Area and PRSP Area	See Mitigation Measures 4.14-2a and 4.14-2c, above	See Mitigation Measures 4.14-2a and 4.14-2c, above	See Mitigation Measures 4.14-2a and 4.14-2c, above
Mitigation Measure 4.14-16: Adopt update to Placer County Countywide CIP and countywide traffic impact fee to include installing traffic signals and capacity-enhancing improvements currently not included in known fee program (Net SAP Area and PRSP Area) Consistent with Mitigation Measure 4.14-2a, the County shall adopt an update to the Placer County Countywide CIP and countywide traffic impact fee concurrently with the SAP and PRSP to include installing traffic signals and capacity-enhancing improvements currently not included in any known fee program at the following intersections: ◢ Sunset Boulevard / South Loop Road/Placer Corporate Drive (net SAP and PRSP areas), ◢ Athens Avenue / Fiddyment Road (net SAP area), ◢ Athens Avenue / Industrial Avenue (net SAP area), ◢ Athens Avenue / Foothills Boulevard North (net SAP area), and ◢ Sunset Boulevard / Cincinnati Avenue (net SAP area).	Net SAP Area and PRSP Area	Placer County Department of Public Works	With submittal of design review application and/or Improvement Plan submittal	Satisfied with building permit issuance and Improvement Plan approval
Prior to the issuance of building permits, project proponents of future development projects within the SAP area, including the PRSP area, shall pay the applicable countywide traffic impact fees, as determined by DPWF, which will provide funding for improvements at the above intersections.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to the issuance of building permits	Satisfied with issuance of building permits, project proponents of future development projects within the SAP area, including the PRSP area
Mitigation Measures Implement Mitigation Measure 4.14-3 (Net SAP Area and PRSP Area).	Net SAP Area and PRSP Area	See Mitigation Measure 4.14-3, above	See Mitigation Measure 4.14-3, above	See Mitigation Measure 4.14-3, above
Mitigation Measure 4.14-17: Pay impact fees to Placer County toward construction of transportation facilities and/or improvements at intersections in City of Roseville (Net SAP Area and PRSP Area) Prior to building permit issuance, project proponents of future development projects within the SAP area, including the PRSP area, shall pay impact fees to Placer County, as determined by DPWF, in amounts that constitute the SAP area's fair share contribution to the construction of transportation facilities and/or improvements at the following intersections within the City of Roseville. ◢ Blue Oaks Boulevard / Foothills Boulevard, ◢ Blue Oaks Boulevard / Woodcreek Oaks Boulevard,	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to building permit issuance for future development projects within the SAP area, including the PRSP area	Satisfied with building permit issuance for future development projects within the SAP area, including the PRSP area

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
◢ Pleasant Grove Boulevard / Roseville Parkway, ◢ Fiddyment Road / Parkland Way/Angus Drive, ◢ Roseville Parkway / Washington Boulevard, ◢ Blue Oaks Boulevard / Fidelity Way, and ◢ Woodcreek Oaks Boulevard / Hop Scotch Way.				
Placer County, in working with the City of Roseville to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Roseville to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Roseville transportation facilities and improvements at intersections. In reaching an accommodation with the City of Roseville, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with just the City of Roseville or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. The County intends that its arrangement(s) with the City of Roseville and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole	Net SAP Area and PRSP Area	Placer County Department of Public Works and City of Roseville	County to enter into an agreement with City of Roseville within a reasonable time period after approval of the SAP, including the PRSP	Satisfied with payment of fair-share mitigation fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
or in part by newly approved projects, (iii) changing cost calculations for the construction of needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Roseville regarding traffic mitigation fees to fund regional improvements. The necessary capacity enhancements to mitigate the project's cumulatively considerable effects at the impacted intersections listed above would include: ◢ Blue Oaks Boulevard / Foothills Boulevard: ◤ Widen the southbound approach to accommodate a third southbound left-turn lane. ◤ Modify signal to provide right-turn overlap phase for westbound and eastbound right-turn movements, and prohibit conflicting U-turn movements. ◢ Blue Oaks Boulevard / Woodcreek Oaks Boulevard: ◤ Increase the storage for the westbound left-turn lanes to a minimum of 500 feet. ◢ Pleasant Grove Boulevard / Roseville Parkway: ◤ Modify the signal operations from the existing split phasing on Roseville Parkway to protected left-turn phasing. ◢ Fiddyment Road / Parkland Way/Angus Drive: ◤ Modify the eastbound and westbound left-turn phasing from protected phasing to permitted phasing. ◢ Roseville Parkway / Washington Boulevard: ◤ Widen the westbound and eastbound approaches to accommodate a third through lane. ◢ Blue Oaks Boulevard / Fidelity Way: ◤ Widen the northbound approach to accommodate a second right-turn lane. ◢ Woodcreek Oaks Boulevard / Hop Scotch Way: ◤ Install a traffic signal. There are no feasible mitigations available for the remaining impacted intersection of Baseline Road / Woodcreek Oaks Boulevard. The intersection would be built to its ultimate configuration with four lanes on Baseline Road and westbound and eastbound left-turn and right-turn pockets under cumulative conditions. The south leg of the intersection is constrained by existing development, making it infeasible to widen the northbound or southbound approaches to accommodate additional through lanes or turn pockets. Signal timing adjustments would not reduce delay sufficiently to restore operations to a better LOS F.				

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measures Implement Mitigation Measure 4.14-10 (Net SAP Area and PRSP Area). Implementation of Phase 4 of the SR 65 Widening project identified under the mitigation discussion of Impact 4.14-23 would result in a shift of traffic from Wildcat Boulevard onto SR 65. This would result in acceptable LOS C operations during the p.m. peak hour at both Whitney Ranch Parkway / Wildcat Boulevard and Stanford Ranch Road / Wildcat Boulevard intersections under cumulative conditions. Mitigation Measure 4.14-23 would obligate project proponents of future development projects within the SAP area, including the PRSP area, to pay their fair share towards this improvement through the SPRTA fee program, applicable regional impact fee programs, and/or impact fees to Placer County.	Net SAP Area and PRSP Area	See Mitigation Measure 4.14-10, above	See Mitigation Measure 4.14-10, above	See Mitigation Measure 4.14-10, above
Mitigation Measure 4.14-18a: Pay fair share cost toward modifying Sunset Boulevard/Lonetree Boulevard/W. Stanford Ranch Road intersection (Net SAP Area and PRSP Area) Prior to building permit issuance, the project proponent shall pay their fair share cost towards modifying the Sunset Boulevard / Lonetree Boulevard/W. Stanford Ranch Road intersection as follows: ◢ Widen the southbound approach to add a second southbound right-turn lane, and ◢ Widen the northbound approach to add a second northbound left-turn lane. This improvement would restore operations to LOS D during the p.m. peak hour.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to building permit issuance	With building permit issuance
Placer County, in working with the City of Rocklin to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Rocklin to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Rocklin intersections. In reaching an accommodation with the City of Rocklin, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with just the City of Rocklin or with additional	Net SAP Area and PRSP Area	Placer County Department of Public Works and City of Rocklin	County to enter into an agreement with City of Rocklin within a reasonable time period after approval of the SAP, including the PRSP	Prior to payment of fair-share mitigation fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. The County intends that its arrangement(s) with the City of Rocklin and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole or in part by newly approved projects, (iii) changing cost calculations for the construction of needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Rocklin regarding traffic mitigation fees to fund regional improvements.				
Mitigation Measure 4.14-18b: Pay fair share cost toward modifying Pacific Street/Sunset Boulevard intersection (Net SAP Area and PRSP Area) Prior to building permit issuance, the project proponent shall pay their fair share cost towards modifying the Pacific Street / Sunset Boulevard intersection as follows: ◢ Restripe the eastbound approach of Sunset Boulevard to feature the following lane configuration as it approaches Pacific Street: two left-turn lanes, one shared through-left turn lane, and one right-turn pocket. This improvement would restore operations to LOS E during the p.m. peak hour.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to building permit issuance	With building permit issuance
Placer County, in working with the City of Rocklin to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Rocklin to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Rocklin intersections. In reaching an accommodation with the City of Rocklin, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As	Net SAP Area and PRSP Area	Placer County Department of Public Works and City of Rocklin	County to enter into an agreement with City of Rocklin within a reasonable time period after approval of the SAP, including the PRSP	Satisfied with payment of fair-share mitigation fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with just the City of Rocklin or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. The County intends that its arrangement(s) with the City of Rocklin and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole or in part by newly approved projects, (iii) changing cost calculations for the construction of needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Rocklin regarding traffic mitigation fees to fund regional improvements.				
Mitigation Measure 4.14-19: Pay fair share cost toward striping second eastbound left-turn lane at Joiner Parkway/Twelve Bridges Drive intersection (Net SAP Area and PRSP Area) Prior to building permit issuance, the project proponent shall pay their fair share cost towards striping a second eastbound left-turn lane at the Joiner Parkway / Twelve Bridges Drive intersection. This improvement would restore operations to LOS D during the p.m. peak hour. The eastbound approach currently has a turn pocket wide enough to support dual eastbound left-turn lanes along with loop detectors to support this improvement. In addition, Joiner Parkway is planned to be widened to a four-lane roadway north of Twelve Bridges Drive, as identified in the Tier 1 SACOG MTP/SCS project list, which will provide adequate receiving lanes.	Net SAP Area and PRSP Area	Placer County Department of Public Works	Prior to building permit issuance	With building permit issuance

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Placer County, in working with the City of Lincoln to provide funding for improvements not already subject to an existing interagency fee program, shall negotiate in good faith with the City of Lincoln to enter into additional fair and reasonable arrangements with the intention of achieving, within a reasonable time period after approval of the SAP, including the PRSP, commitment for the provision of adequate fair share mitigation from the SAP/PRSP for significant impacts on City of Lincoln intersections. In reaching an accommodation with the City of Lincoln, the County and City, in order to better ensure an effective sub-regional approach to mitigating transportation-related impacts, may choose to include within the same agreements or JPA (if a JPA is formed) additional public agencies with whom it must work to mitigate transportation-related impacts, such as Sacramento County, Sutter County, and Caltrans. As the County strives to achieve agreement(s) with one or more of these other agencies, the County shall insist that "fair share" fee obligations be reciprocal, in the sense that the other local agencies, in accepting fair share contributions from the SAP/PRSP developers, must agree to require new development occurring in their own jurisdictions to make fair share contributions towards mitigating the significant effects of such development on the County's transportation network. Any such arrangement(s), with just the City of Lincoln or with additional agencies, shall account for existing inter-agency fee programs in order to avoid requiring redundant mitigation or fee payments exceeding fair share mitigation levels. The County intends that its arrangement(s) with the City of Lincoln and any other agencies shall permit the participating agencies' flexibility in providing cross-jurisdictional credits and reimbursements consistent with the general "fair share" mitigation standard, and require an updated model run incorporating the best available information in order to obtain the most accurate, up-to-date impact assessment feasible and to generate the most accurate, up-to-date estimates of regional fair share contributions. These arrangements, moreover, should also include provisions that allow for periodic updates to the traffic modeling on which fair share payment calculations depend in order to account for (i) newly approved projects cumulatively contributing to transportation-related impacts and that therefore should contribute to the funding of necessary improvements, (ii) additional physical improvements necessitated in whole or in part by newly approved projects, (iii) changing cost calculations for the construction of needed improvements based on changes in the costs of materials, labor, and other inputs. The County will monitor traffic volumes and coordinate with the City of Lincoln regarding traffic mitigation fees to fund regional improvements.	Net SAP Area and PRSP Area	Placer County Department of Public Works and City of Lincoln	County to enter into an agreement with City of Lincoln within a reasonable time period after approval of the SAP, including the PRSP	Satisfied with payment of fair-share mitigation fees

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.14-22: Pay fair share cost toward signal modification at Placer Parkway/SR 65 southbound ramps intersection (Net SAP Area and PRSP Area) Prior to building permit issuance, the project proponent shall pay their fair share cost towards the following signal modification at the Placer Parkway / SR 65 Southbound Ramps intersection: ◢ Restripe the southbound off-ramp approach to feature the following lane configuration: one left-turn lane, one shared through-right turn lane, and one right-turn lane. This modification would improve operations to LOS B during the p.m. peak hour and maintain LOS B operations during the a.m. peak hour. This mitigation requires Placer County, on behalf of the project proponent, to negotiate in good faith with Caltrans to identify the fair share funding contribution and establish a means to provide this funding to Caltrans.	Net SAP Area and PRSP Area	Placer County Department of Public Works and Caltrans	Prior to building permit issuance	With building permit issuance
Mitigation Measures Implement Mitigation Measure 4.14-10 (Net SAP Area and PRSP Area).	Net SAP Area and PRSP Area	See Mitigation Measure 4.14-10, above	See Mitigation Measure 4.14-10, above	See Mitigation Measure 4.14-10, above
Mitigation Measures Implement Mitigation Measures 4.14-12a and 4.14-12b (Net SAP Area and PRSP Area).	Net SAP Area and PRSP Area	See Mitigation Measures 4.14-12a and 4.14-12b, above	See Mitigation Measures 4.14-12a and 4.14-12b, above	See Mitigation Measures 4.14-12a and 4.14-12b, above
4.15 Utilities				
Mitigation Measure 4.15-2: Ensure adequate water treatment capacity (Net SAP Area and PRSP Area) Prior to approval of each small lot tentative map within the net SAP or PRSP areas, water demand shall be identified and water treatment capacity necessary to serve the proposed development in the small lot tentative map area shall be identified. No small lot tentative map(s) shall be approved within the net SAP or PRSP unless and until adequate water treatment capacity is identified.	Net SAP Area and PRSP Area	Placer County CDRA and Environmental Engineering Division in coordination with PCWA	Prior to approval of each small lot tentative map within the net SAP or PRSP areas or design review, as applicable	Satisfied with approval of each small lot tentative map within the net SAP or PRSP areas or design review, as applicable
Mitigation Measure 4.15-4a: Annex to SPWA's regional service area and PGWWTP's service area (Net SAP Area and PRSP Area) Prior to improvement plan approval for development in the net SAP and PRSP areas that are outside the service boundaries of SPWA and PGWWTP, project proponents shall demonstrate to Placer County that the SPWA has approved expansion of the SPWA 2005 Regional Service Area Boundary to include the affected areas. Also, the project proponents shall demonstrate that SPWA has approved expansions of the PGWWTP service boundary to include the affected areas.	Net SAP Area and PRSP Area	Placer County Environmental Engineering Division	Prior to improvement plan approval for development in the net SAP and PRSP areas that are outside the service boundaries of SPWA and PGWWTP	Satisfied with improvement plan approval for development in the net SAP and PRSP areas that are outside the service boundaries of SPWA and PGWWTP

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 4.15-4b: Confirm infrastructure capacity (Net SAP Area and PRSP Area) Prior to improvement plan approval for development in the net SAP or PRSP areas, project proponents shall provide confirmation from SPWA and the City of Roseville that there is sufficient infrastructure and treatment capacity to serve the final design plan flows for the proposed development. Future projects within the net SAP and PRSP areas shall participate financially in the construction of additional wastewater treatment capacity sufficient to accommodate projected flows through payment of connection fees facilitated through annexation into CSA 28, Zone 2A3. Project proponents shall also participate on a fair share basis in other financing mechanisms for any additional environmental review required to secure approvals necessary to increase wastewater discharges from the plant, including approval by the SPWA for expansion of the service area boundary. It is recognized that the project proponents shall rely on the City of Roseville (on behalf of the SPWA partners) to construct the wastewater treatment expansion needed to treat and discharge wastewater produced within the PGWWTP service area boundary, including buildout of the net SAP and PRSP areas.	Net SAP Area and PRSP Area	Placer County Environmental Engineering Division	Prior to improvement plan approval for development in the net SAP or PRSP areas	Satisfied with improvement plan approval for development in the net SAP or PRSP areas
Mitigation Measures Implement Mitigation Measures 4.6-1a and 4.6-1b, as well as 4.6-1c, identified in Section 4.6, "Geology and Soils," and Mitigation Measures 4.9-1a and 4.9-1b, identified in Section 4.9, "Hydrology and Water Quality."	Net SAP Area and PRSP Area	See Mitigation Measures 4.6-1a, 4.6-1b, 4.6-1c, 4.9-1a, and 4.9-1b, above	See Mitigation Measures 4.6-1a, 4.6-1b, 4.6-1c, 4.9-1a, and 4.9-1b, above	See Mitigation Measures 4.6-1a, 4.6-1b, 4.6-1c, 4.9-1a, and 4.9-1b, above
Mitigation Measure 4.15-14: Ensure sufficient capacity in City of Roseville wastewater conveyance lines Prior to development project improvement plans approval for the first development phase of the net SAP area and the first development phase of the PRSP area, the project proponents for future development within these plan areas shall update the net SAP area and PRSP area buildout peak wastewater flows based on each project's final design. If the project proponents find that the project-generated peak wastewater flows exceed the capacity of the Pleasant Grove Creek crossing sewer line and/or the Pleasant Grove sewer trunk line downstream of the net SAP area and PRSP area points of connection, the project proponents shall develop plans for and construct improvements that would allow for conveyance of each project's buildout wastewater flows. Development within the net SAP and PRSP areas shall pay its fair share toward the development, construction, and operation of any upsizing of these existing facilities or additional wastewater conveyance lines if existing facilities are not upsized. There is an existing reimbursement agreement for additional capacity in the Pleasant Grove Creek crossing between Placer County and West Roseville Development Company, Inc., dated May 3, 2008.	Net SAP Area and PRSP Area	Placer County Environmental Engineering Division in coordination with City of Roseville/SPWA	Prior to development project improvement plans approval for the first development phase of the net SAP area and the first development phase of the PRSP area	Satisfied with approval of development project improvement plans for the first development phase of the net SAP area and the first development phase of the PRSP area

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Project Area	Agency Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Any negotiation of fair share fees associated with the crossing shall be in compliance with this agreement. The improvements shall be constructed to meet peak wet weather flows determined by final design plans, in the sewer lines downstream of the net SAP area and PRSP area points of connection with the Pleasant Grove Creek crossing sewer line and/or the Pleasant Grove sewer trunk line. The plans shall identify the timing of the improvements and confirm that the capacity of the lines would be available when needed by development within the net SAP and PRSP areas. Improvements shall include: ◢ replacing the existing City of Roseville wastewater conveyance lines with larger sewer lines that would increase capacity to serve future demand for wastewater conveyance or ◢ installing an additional wastewater conveyance line parallel to the existing City of Roseville lines that increases capacity to serve future demand for wastewater conveyance.				
Mitigation Measures Implement Mitigation Measure 4.15-4a: Annex to SPWA's regional service area and PGWWTP's service area, and Mitigation Measure 4.15-4b: Confirm infrastructure capacity.	Net SAP Area and PRSP Area	See Mitigation Measures 4.15-4a and 4.15-4b, above	See Mitigation Measures 4.15-4a and 4.15-4b, above	See Mitigation Measures 4.15-4a and 4.15-4b, above

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6 LIST OF PREPARERS

LEAD AGENCY

Placer County

Crystal Jacobsen ..... Planning Services Division
Leigh Chavez ..... Environmental Coordinator
Michele Kingsbury ..... Community Development Resource Agency
Patrick Dobbs ..... Planning Services Division
Angel Green ..... Planning Services Division
Karin Schwab ..... County Counsel
Clayton Cook ..... County Counsel
Sherri Conway ..... Economic Development
Rebecca Taber ..... Engineering and Surveying Division
Richard Moorehead ..... Department of Public Works
Amber Conboy ..... Department of Public Works
Lisa Carnahan ..... Parks Division
Shirlee Herrington ..... Environmental Coordination Services

PREPARERS OF THE ENVIRONMENTAL DOCUMENT

Ascent Environmental, Inc. (EIR Preparation)

Sydney Coatsworth, AICP ..... Principal
Mike Parker, AICP ..... Project Manager
Cori Resha, J.D. ..... Assistant Project Manager
Sarah Henningsen. ..... Assistant Project Manager
Jim Merk ..... Technical Editor
Hannah Kornfeld ..... Air Quality, Greenhouse Gas Emissions, Energy
Dimitri Antoniou ..... Noise
Kristi Black ..... Aesthetics; Land Use
Alta Cunningham ..... Agricultural Resources; Archaeological, Historical, and Tribal Cultural Resources
Tammie Beyerl ..... Biological Resources
Steve Henderson ..... Biological Resources
Angie Xiong ..... Geology and Soils
Kelley Kelso ..... Hazards and Hazardous Materials
Nanette Hansel ..... Hydrology and Water Quality
Rachel Kozloski ..... Hydrology and Water Quality
Jessica Mitchell ..... Public Services and Utilities
Lisa Merry ..... GIS Specialist/Graphics
Phi Ngo ..... GIS Specialist/Graphics
Brian Perry ..... Graphics
Gayiety Lane ..... Publication Specialist
Michele Mattei ..... Publication Specialist

Fehr & Peers (Transportation and Circulation)

Alan Telford ..... Principal-in-Charge
Robert Hananouchi ..... Project Manager
Neil Smolen ..... Lead Transportation Planner

Mintier Harnish (Sunset Area Plan)

Jim Harnish ..... Principal-in-Charge
Bob Lagomarsino..... Project Manager
Brent Gibbons.....Associate
Amy Yang.....Planner
Ryan Lester.....Graphic Production Manager

MacKay & Somps (Placer Ranch Specific Plan)

Mark Sauer ..... Civil Engineer and Principal-in-Charge
Vance Jones.....Planner
Ron Enz .....Planner

Psomas (Sunset Area Plan Engineer)

Mike Swan..... Senior Project Manager

Kimley-Horn (Transportation and Traffic—Sunset Area Plan)

Jim Damkowitch..... Transportation Engineer

Economic & Planning Systems (Market and Urban Decay Analysis)

David Zehnder ..... Principal-in-Charge
Amy Lapin..... Project Manager
Kate O'Beirne.....Technical Analyst